

**PUBLIC NOTICE**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)**  
**GEORGIA-PACIFIC LLC - EDC BASIN AND ASSOCIATED DITCHES**  
**FINAL HAZARDOUS WASTE POST-CLOSURE PERMIT MODIFICATION**

The LDEQ, Office of Environmental Services, has made the decision to issue the final Class 3 hazardous waste post-closure permit modification for Georgia-Pacific LLC (Georgia-Pacific), P.O. Box 629, Plaquemine, Louisiana 70765 for the EDC Basin and Associated Ditches. **The facility is located at 26100 Highway 405, Plaquemine, Iberville Parish.**

Under this final hazardous waste post-closure permit modification; Georgia-Pacific will conduct post-closure care of the EDC Basin and associated ditches under a revised groundwater monitoring program. The final hazardous waste post-closure permit modification also includes revised reporting requirements, as well as minor corrections to the body of the text of the permit.

The final permitting action and related documents are available for review and copying (all documents copied will be subject to a \$0.25 charge per copied page) at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at [www.deq.louisiana.gov](http://www.deq.louisiana.gov).**

An additional copy of this action may be reviewed at the Iberville Parish Library, Headquarters, 24605 J. Gerald Blvd., Plaquemine, Louisiana.

In accordance with Louisiana Revised Statutes (La R.S.) 30:2024, the Permittee may file with the secretary a request for a hearing no later than thirty (30) days after the notice of the action is served. Under La. R.S. 30:2050.21, any person aggrieved by a final permit action may appeal to the Nineteenth Judicial District Court within 30 days after the notice of the action has been given.

Previous notices have been published in the The Advocate (Baton Rouge) and Post-South (Plaquemine) on Thursday, December 13th, 2007.

Inquiries or requests for additional information regarding this permit action, should be directed to Mr. Craig Easley, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3050.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at [deqmaillistrequest@la.gov](mailto:deqmaillistrequest@la.gov) or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

**Permit public notices including electronic access to the issued permit and associated information** can be viewed at the LDEQ permits public notice webpage at [www.deq.louisiana.gov/apps/pubNotice/default.asp](http://www.deq.louisiana.gov/apps/pubNotice/default.asp) and general information related to the public participation in permitting activities can be viewed at [www.deq.louisiana.gov/portal/tabid/2198/Default.aspx](http://www.deq.louisiana.gov/portal/tabid/2198/Default.aspx)

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at [www.doa.louisiana.gov/oes/listservpage/ldeq\\_pn\\_listserv.htm](http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm)

**All correspondence should specify AI Number 25738, Permit Number LAR000003483-PC-2-MO-1, and Activity Number PER20070002.**

**Publication date: March 27, 2008**

**FINAL  
MODIFIED POST-CLOSURE PERMIT**

**GEORGIA PACIFIC COPORATION  
PLAQUEMINE, LOUISIANA  
LAR 000003483-PC-2-MO-1  
AI#25738 / PER20070002**

**RECORD CENTER COPY**

# **MODIFICATION AUTHORIZATION**

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**MODIFIED PERMIT**

**MODIFICATION AUTHORIZATION**

**PERMITTEE:** GEORGIA PACIFIC CORPORATION

**PERMIT NUMBER:** LAR000003483 -PC-2-MO-1

**AGENCY INTEREST:** AI 25738

**PERMIT ACTIVITY NO.:** PER 20070002

**FACILITY:** IBERVILLE PARISH

**LOCATION:** P.O. BOX 629  
6100 HIGHWAY 405  
PLAQUEMINE, LOUISIANA 70764

**PERMITTED POST-CLOSURE UNIT**

**EDC BASIN AND ASSOCIATED DITCHES**

This modification applies to the permit issued on January 12, 2004, by the Louisiana Department of Environmental Quality (LDEQ) and the United States Environmental Protection Agency (USEPA) under the authority of the Louisiana Hazardous Waste Control Law R.S. 20:2171 et seq., and the regulations adopted thereunder and by the EPA under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to Resource Conservation and Recovery Act (RCRA) to Georgia Pacific Corporation, Plaquemine Facility, (hereafter called the Permittee), for the permitted hazardous waste management unit, the EDC Basin and Associated Ditches, at a facility located at 6100 Highway 405, Plaquemine, Iberville Parish, Louisiana 70764, at latitude 30°16'12" North and longitude 91°10'48" West.

For the purposes of this permit, the "Administrative Authority" shall be the Secretary of the Louisiana Department of Environmental Quality, or his/her designee.

The Permittee must comply with all terms and conditions of this permit as modified according to the procedures and under the authority of the Louisiana Administrative Code (LAC) 33:V, Chapter 3. Modification of the HSWA section was carried out according to the procedures and authorization of Title 40 Code of Regulations (40 CFR) 270.41 and LAC 33:V, Subpart 1. This permit consists of the conditions contained herein and the applicable regulations as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit.


This permit is based on the assumption that the information provided to LDEQ by the Permittee is accurate. Further, this permit is based in part on the provisions of Sections 206, 212, and 224 of the HSWA of 1984, which modify Section 3004 and 3005 of RCRA. In particular, Section 206 requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit.

Section 212 provides authority to review and modify the permit at any time. Any inaccuracies found in the submitted information may be grounds for the termination, modification, revocation, and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The Permittee must inform the LDEQ of any deviation from or changes in the information in the application, which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This modified permit shall be effective as of March 27, 2008, and shall remain in effect until January 12, 2014, unless revoked, reissued, modified or terminated in accordance with LAC 33:V.323 and 705. The Administrative Authority may issue any permit for a duration that is less than the maximum term of ten (10) years and the term shall not be extended beyond the maximum duration by modification in accordance with LAC 33:V.315.

Provisions of this permit may be appealed in writing pursuant to LA: R.S. 30:2024(A) within thirty (30) days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. A request for hearing must be sent to the following:

LA. Department of Environmental Quality  
Office of the Secretary  
Attention: Hearing Clerk, Legal Services Division  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302

  
\_\_\_\_\_  
Cheryl Sonnier Nolan, Assistant Secretary  
Louisiana Department of Environmental Quality

12 March 2008  
\_\_\_\_\_  
Date

# **PUBLIC PARTICIPATION**

**PUBLIC NOTICE**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)**  
**GEORGIA-PACIFIC LLC - EDC BASIN AND ASSOCIATED DITCHES**  
**FINAL HAZARDOUS WASTE POST-CLOSURE PERMIT MODIFICATION**

The LDEQ, Office of Environmental Services, has made the decision to issue the final Class 3 hazardous waste post-closure permit modification for Georgia-Pacific LLC (Georgia-Pacific), P.O. Box 629, Plaquemine, Louisiana 70765 for the EDC Basin and Associated Ditches. **The facility is located at 26100 Highway 405, Plaquemine, Iberville Parish.**

Under this final hazardous waste post-closure permit modification; Georgia-Pacific will conduct post-closure care of the EDC Basin and associated ditches under a revised groundwater monitoring program. The final hazardous waste post-closure permit modification also includes revised reporting requirements, as well as minor corrections to the body of the text of the permit.

The final permitting action and related documents are available for review and copying (all documents copied will be subject to a \$0.25 charge per copied page) at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at [www.deq.louisiana.gov](http://www.deq.louisiana.gov).**

An additional copy of this action may be reviewed at the Iberville Parish Library, Headquarters, 24605 J. Gerald Blvd., Plaquemine, Louisiana.

In accordance with Louisiana Revised Statutes (La R.S.) 30:2024, the Permittee may file with the secretary a request for a hearing no later than thirty (30) days after the notice of the action is served. Under La. R.S. 30:2050.21, any person aggrieved by a final permit action may appeal to the Nineteenth Judicial District Court within 30 days after the notice of action has been given.

Previous notices have been published in the The Advocate (Baton Rouge) and Post-South (Plaquemine) on Thursday, December 13th, 2007.

Inquiries or requests for additional information regarding this permit action, should be directed to Mr. Craig Easley, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3050.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at [deqmaillistrequest@la.gov](mailto:deqmaillistrequest@la.gov) or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

**Permit public notices including electronic access to the issued permit and associated information can be viewed at the LDEQ permits public notice webpage at [www.deq.louisiana.gov/apps/pubNotice/default.asp](http://www.deq.louisiana.gov/apps/pubNotice/default.asp) and general information related to the public participation in permitting activities can be viewed at [www.deq.louisiana.gov/portal/tabid/2198/Default.aspx](http://www.deq.louisiana.gov/portal/tabid/2198/Default.aspx)**

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at [www.doa.louisiana.gov/oes/listservpage/ldeq\\_pn\\_listserv.htm](http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm)

**All correspondence should specify AI Number 25738, Permit Number LAR000003483-PC-2-MO-1, and Activity Number PER20070002.**

**Publication date: March 27, 2008**

BOBBY JINDAL  
GOVERNOR



HAROLD LEGGETT, Ph.D.  
SECRETARY

# State of Louisiana

## DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

March 20, 2008

Telephone (225) 687-3116

Honorable Mark A. "Tony" Gulotta, Mayor  
City of Plaquemine  
23640 Railroad Avenue  
Plaquemine, LA 70765

Re: Request for Public Comment  
Georgia Pacific Corporation  
Plaquemine Facility  
Iberville Parish, Louisiana  
Agency Interest No. 25738 / LAR 000003483-PC-2-MO-1 / PER20070002

Dear Mayor Gulotta:

Enclosed is a copy of the final class 3 hazardous waste permit modification and request for public notice for the referenced facility. This information should be made available for public review upon receipt. It is imperative that these documents are available for review at all times; therefore, it cannot be checked out at any time by anyone.

The Louisiana Department of Environmental Quality, Office of Environmental Services, (LDEQ-OES) Permits Division, will provide written notice to you requesting that the information be removed.

Please complete the attached verification form and mail to me, LDEQ-OES, Environmental Assistance Division, Post Office Box 4313, Baton Rouge, Louisiana 70821-4313, or fax it to (225) 219-3309.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3280.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Mason".

Barbara Mason  
Environmental Project Specialist  
Public Participation Group

/bm  
Enclosure



BOBBY JINDAL  
GOVERNOR



HAROLD LEGGETT, Ph.D.  
SECRETARY

State of Louisiana  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
ENVIRONMENTAL SERVICES

March 18, 2008

Via Facsimile (225) 687-1814  
Ms. Liz Troxclair  
Plaquemine Post South  
Post Office Box 589  
Plaquemine, LA 70765

Re: Issuance of Final Post Closure Permit  
Georgia Pacific Corporation  
Plaquemine Facility  
Iberville Parish, Louisiana  
Agency Interest No. 25738 / LAR 000003483-PC-2-MO-1 / PER20070002

Dear Ms. Troxclair:

Please publish the attached legal notice regarding the above referenced facility as a legal ad in the Plaquemine Post South once only on **March 27, 2008**.

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this department to be assured that adequate notification is provided, we are requesting that you sign and date the enclosed 'Verification by Newspaper', and fax it to my attention (225) 219-3309 immediately upon publication. If the notice cannot be published in the format requested, or on the date requested, please contact me immediately at (225) 219-3280 or email [barbara.mason@la.gov](mailto:barbara.mason@la.gov).

Please forward invoice to:  
Ms. Julie Raming, Manager, Environmental Affairs,  
Georgia Pacific Corporation, Plaquemine Facility,  
133 Peachtree Street, N.E.  
Atlanta, GA 30303  
Telephone (404) 652-6869

Send the tear sheet stating the notice was published as requested to my attention, Office of Environmental Services/Environmental Assistance Division, Post Office Box 4313, Baton Rouge, LA 70821-4313.

Thank you for assisting in our effort to serve the public.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Mason".

Barbara Mason  
Environmental Project Specialist  
Public Participation Group

/bm

BOBBY JINDAL  
GOVERNOR



HAROLD LEGGETT, Ph.D.  
SECRETARY

State of Louisiana  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
ENVIRONMENTAL SERVICES

March 18, 2008

Via Facsimile (225) 388-0164  
Ms. Susan Bush  
The Advocate  
Post Office Box 588  
Baton Rouge, LA 70821-0588

Re: Issuance of Final Post Closure Permit  
Georgia Pacific Corporation  
Plaquemine Facility  
Iberville Parish, Louisiana  
Agency Interest No. 25738 / LAD 000003483-PC-2-MO-1 / PER20070002

Dear Ms. Bush:

Please publish the attached legal notice regarding the above referenced facility as a legal ad in The Advocate once only on **March 27, 2008**.

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this department to be assured that adequate notification is provided, we are requesting that you sign and date the enclosed 'Verification by Newspaper', and fax it to my attention (225) 219-3309 immediately upon publication. If the notice cannot be published in the format requested, or on the date requested, please contact me immediately at (225) 219-3280 or email [barbara.mason@la.gov](mailto:barbara.mason@la.gov).

Please forward invoice to:  
Ms. Julie Raming, Manager, Environmental Affairs,  
Georgia Pacific Corporation, Plaquemine Facility,  
133 Peachtree Street, N.E.  
Atlanta, GA 30303  
Telephone (404) 652-6869

Send the tear sheet stating the notice was published as requested to my attention, Office of Environmental Services/Environmental Assistance Division, Post Office Box 4313, Baton Rouge, LA 70821-4313.

Thank you for assisting in our effort to serve the public.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Mason".

Barbara Mason  
Environmental Project Specialist  
Public Participation Group

/bm

BOBBY JINDAL  
GOVERNOR



HAROLD LEGGETT, PH.D.  
SECRETARY

State of Louisiana  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
ENVIRONMENTAL SERVICES

March 18, 2008

Telephone: (225) 687-4397  
Mr. Dan Ball, Director  
Iberville Parish Library  
24605 J. Gerald Berret Blvd.  
Plaquemine, LA 70764-0736

Re: Issuance of Final Post Closure Permit  
Georgia Pacific Corporation  
Plaquemine Facility  
Iberville Parish, Louisiana  
Agency Interest No. 25738 / LAR 000003483-PC-2-MO-1 / PER20070002

Dear Mr. Ball:

We request that the enclosed final class 3 hazardous waste permit modification and request for public notice for the referenced facility are made available for public review upon receipt. It is imperative that these documents be available for review at all times. Therefore, they cannot be checked out at any time by anyone.

The documents should be retained during the permitting process. At the close of the permitting period, the LDEQ, Office of Environmental Services, Permits Division, will provide written notice to you requesting that the information be removed.

Please complete the attached verification by Library Staff and mail to my attention at LDEQ-OES, Environmental Assistance Division, P.O. Box 4313, Baton Rouge, LA 70821-4313 or fax (225) 219-3309.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3280.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Mason".

Barbara Mason  
Environmental Project Specialist  
Public Participation Group

/bm  
Enclosures

BOBBY JINDAL  
GOVERNOR



HAROLD LEGGETT, Ph.D.  
SECRETARY

**State of Louisiana**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**ENVIRONMENTAL SERVICES**

March 18, 2008

Telephone: (214) 665-6669

Mr. Kishor Fruitwala  
U. S. EPA, Region VI  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Re: Issuance of Final Post Closure Permit  
Georgia Pacific Corporation  
Plaquemine Facility  
Iberville Parish, Louisiana  
Agency Interest No. 25738 / LAR 000003483-PC-2-MO-1 / PER20070002

Dear Mr. Fruitwala:

The Louisiana Department of Environmental Quality (LDEQ) is enclosing for your reference, a copy of the final class 3 hazardous waste permit modification and the legal notice is schedule to publish in the Plaquemine Post South and The Advocate on March 27, 2008.

Should you have any questions regarding the facility, additional permit information may be obtained from Mr. Craig Easley, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3150.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Mason".

Barbara Mason  
Environmental Project Specialist  
Public Participation Group

/bm  
Enclosures

# **PART A**

# **APPLICATION**

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved OMB No. 2050-0034 Expires 9-30-87  
GSA No. 0346-EPA-07

<p><b>For EPA Regional Use Only</b></p> <p>Date Received Month Day Year</p>	<p>United States Environmental Protection Agency Washington, DC 20460</p> <h2 style="margin: 0;">Hazardous Waste Permit Application</h2> <h3 style="margin: 0;">Part A</h3> <p><i>(Read the Instructions before starting)</i></p>	<p><b>For State Use Only</b></p>																																																																																																																											
<p><b>I. Installation's EPA ID Number (Mark 'X' in the appropriate box)</b></p> <table style="width: 100%;"> <tr> <td style="width: 50%;"><input checked="" type="checkbox"/> A. First Part A Submission</td> <td style="width: 50%;"><input type="checkbox"/> B. Part A Amendment # _____</td> </tr> </table>			<input checked="" type="checkbox"/> A. First Part A Submission	<input type="checkbox"/> B. Part A Amendment # _____																																																																																																																									
<input checked="" type="checkbox"/> A. First Part A Submission	<input type="checkbox"/> B. Part A Amendment # _____																																																																																																																												
<p>C. Installation's EPA ID Number      D. Secondary ID Number (If applicable)</p> <table style="width: 100%; text-align: center;"> <tr> <td>L</td><td>A</td><td>R</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td><td>3</td><td>4</td><td>8</td><td>3</td> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td> </tr> </table>			L	A	R	0	0	0	0	0	3	4	8	3																																																																																																															
L	A	R	0	0	0	0	0	3	4	8	3																																																																																																																		
<p><b>II. Name of Facility</b></p> <table style="width: 100%; text-align: center;"> <tr> <td>E</td><td>D</td><td>C</td><td></td><td>B</td><td>A</td><td>S</td><td>I</td><td>N</td><td></td><td>&amp;</td><td></td><td>A</td><td>S</td><td>S</td><td>O</td><td>C</td><td>I</td><td>A</td><td>T</td><td>E</td><td>D</td><td></td><td>D</td><td>I</td><td>T</td><td>C</td><td>H</td><td>E</td><td>S</td> </tr> </table>			E	D	C		B	A	S	I	N		&		A	S	S	O	C	I	A	T	E	D		D	I	T	C	H	E	S																																																																																													
E	D	C		B	A	S	I	N		&		A	S	S	O	C	I	A	T	E	D		D	I	T	C	H	E	S																																																																																																
<p><b>III. Facility Location (Physical address not P.O. Box or Route Number)</b></p> <p><b>A. Street</b></p> <table style="width: 100%; text-align: center;"> <tr> <td>2</td><td>6</td><td>1</td><td>0</td><td>0</td><td></td><td>L</td><td>A</td><td></td><td>H</td><td>I</td><td>G</td><td>H</td><td>W</td><td>A</td><td>Y</td><td></td><td>4</td><td>0</td><td>5</td><td></td><td>-</td><td>8</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td> </tr> </table> <p>Street (continued)</p> <table style="width: 100%; text-align: center;"> <tr> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td> </tr> </table> <p><b>City or Town</b>      <b>State</b>      <b>ZIP Code</b></p> <table style="width: 100%; text-align: center;"> <tr> <td>P</td><td>L</td><td>A</td><td></td><td>Q</td><td>U</td><td>E</td><td>M</td><td>I</td><td>N</td><td>E</td><td></td><td></td><td></td><td></td><td></td><td></td><td>L</td><td>A</td><td></td><td>7</td><td>0</td><td>7</td><td>6</td><td>4</td><td>-</td><td></td><td></td><td></td><td></td> </tr> </table> <p><b>County Code</b>      <b>County Name</b></p> <table style="width: 100%; text-align: center;"> <tr> <td>0</td><td>4</td><td>7</td><td></td><td>I</td><td>B</td><td>E</td><td>R</td><td>V</td><td>I</td><td>L</td><td>L</td><td>E</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td> </tr> </table>			2	6	1	0	0		L	A		H	I	G	H	W	A	Y		4	0	5		-	8																																								P	L	A		Q	U	E	M	I	N	E							L	A		7	0	7	6	4	-					0	4	7		I	B	E	R	V	I	L	L	E																		
2	6	1	0	0		L	A		H	I	G	H	W	A	Y		4	0	5		-	8																																																																																																							
P	L	A		Q	U	E	M	I	N	E							L	A		7	0	7	6	4	-																																																																																																				
0	4	7		I	B	E	R	V	I	L	L	E																																																																																																																	
<p><b>B. Land Type</b>      <b>C. Geographic Location</b>      <b>D. Facility Existence Date</b></p> <table style="width: 100%;"> <tr> <td style="width: 15%;">(enter code)</td> <td style="width: 25%;">LATITUDE (degrees, minutes, &amp; seconds)</td> <td style="width: 25%;">LONGITUDE (degrees, minutes, &amp; seconds)</td> <td style="width: 35%;">Month    Day    Year</td> </tr> <tr> <td>P</td> <td>3 0 1 6 0 1 2</td> <td>0 9 1 1 0 0 4 8</td> <td>    1 9 7 4</td> </tr> </table>			(enter code)	LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)	Month    Day    Year	P	3 0 1 6 0 1 2	0 9 1 1 0 0 4 8	1 9 7 4																																																																																																																			
(enter code)	LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)	Month    Day    Year																																																																																																																										
P	3 0 1 6 0 1 2	0 9 1 1 0 0 4 8	1 9 7 4																																																																																																																										
<p><b>IV. Facility Mailing Address</b></p> <p>Street or P.O. Box</p> <table style="width: 100%; text-align: center;"> <tr> <td>P</td><td>O</td><td></td><td>B</td><td>O</td><td>X</td><td></td><td>6</td><td>2</td><td>9</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td> </tr> </table> <p><b>City or Town</b>      <b>State</b>      <b>ZIP Code</b></p> <table style="width: 100%; text-align: center;"> <tr> <td>P</td><td>L</td><td>A</td><td></td><td>Q</td><td>U</td><td>E</td><td>M</td><td>I</td><td>N</td><td>E</td><td></td><td></td><td></td><td></td><td></td><td></td><td>L</td><td>A</td><td></td><td>7</td><td>0</td><td>7</td><td>6</td><td>5</td><td>-</td><td>0</td><td>6</td><td>2</td><td>9</td> </tr> </table>			P	O		B	O	X		6	2	9																						P	L	A		Q	U	E	M	I	N	E							L	A		7	0	7	6	5	-	0	6	2	9																																																														
P	O		B	O	X		6	2	9																																																																																																																				
P	L	A		Q	U	E	M	I	N	E							L	A		7	0	7	6	5	-	0	6	2	9																																																																																																
<p><b>V. Facility Contact (Person to be contacted regarding waste activities at facility)</b></p> <table style="width: 100%;"> <tr> <td style="width: 50%;">Name (last)</td> <td style="width: 50%;">(first)</td> </tr> <tr> <td>H A Y N E S</td> <td>P A T R I C I A</td> </tr> <tr> <td>Job Title</td> <td>Phone Number (area code and number)</td> </tr> <tr> <td>M G R E N V S E R V</td> <td>5 0 4 - 6 8 5 - 2 6 2 5</td> </tr> </table>			Name (last)	(first)	H A Y N E S	P A T R I C I A	Job Title	Phone Number (area code and number)	M G R E N V S E R V	5 0 4 - 6 8 5 - 2 6 2 5																																																																																																																			
Name (last)	(first)																																																																																																																												
H A Y N E S	P A T R I C I A																																																																																																																												
Job Title	Phone Number (area code and number)																																																																																																																												
M G R E N V S E R V	5 0 4 - 6 8 5 - 2 6 2 5																																																																																																																												
<p><b>VI. Facility Contact Address (See Instructions)</b></p> <p><b>A. Contact Address Location</b>      <b>B. Street or P.O. Box</b></p> <table style="width: 100%;"> <tr> <td style="width: 50%;"><input checked="" type="checkbox"/> Location    <input checked="" type="checkbox"/> Mailing</td> <td style="width: 50%;"></td> </tr> </table> <p><b>City or Town</b>      <b>State</b>      <b>ZIP Code</b></p> <table style="width: 100%; text-align: center;"> <tr> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td> </tr> </table>			<input checked="" type="checkbox"/> Location <input checked="" type="checkbox"/> Mailing																																																																																																																										
<input checked="" type="checkbox"/> Location <input checked="" type="checkbox"/> Mailing																																																																																																																													

[illegible]

EPA I.D. Number (enter from page 1)												Secondary ID Number (enter from page 1)											
L	A	R	O	O	O	O	O	3	4	8	3												

## XI. Nature of Business (provide a brief description)

Temporary process storm water holding facility closed in place. No further activities are planned for this facility.

## XII. Process - Codes and Design Capacities

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in item XIII.

B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.

1. AMOUNT - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process unit.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Disposal</b>			<b>Boilers And Industrial Furnaces</b>		
D79	Injection Well	Gallons; Liters; Gallons Per Day; Or Liters Per Day	T80	Boiler	Gallons Or Liters
D80	Landfill	Acre-feet Or Hectare-meter	T81	Cement Kiln	
D81	Land Application	Acres Or Hectares	T82	Lime Kiln	
D82	Ocean Disposal	Gallons Per Day Or Liters Per Day	T83	Aggregate Kiln	
D83	Surface Impoundment	Gallons Or Liters	T84	Phosphate Kiln	
<b>Storage</b>			T85	Coke Oven	
S01	Container (Barrel, Drum, Etc.)	Gallons Or Liters	T86	Blas Furnace	
S02	Tank	Gallons Or Liters	T87	Smelting, Melting, Or Refining Furnace	
S03	Waste Pile	Cubic Yards Or Cubic Meters	T88	Titanium Dioxide Chloride Process	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per
S04	Surface Impoundment	Gallons Or Liters	T89	Methane Reforming	Per Hour; Metric Tons Per
<b>Treatment</b>			T90	Pulping Liquor Recovery Furnace	Or Short Tons Per Day
T01	Tank	Gallons Per Day Or Liters Per Day	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
T02	Surface Impoundment	Gallons Per Day Or Liters Per Day	T92	Halogen Acid Furnaces	
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Or Btu's Per Hour	T93	Other Industrial Furnaces Listed In 40 CFR §260.10	
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Or Short Tons Per Day	T94	Containment Building	

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	E	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	U	Short Tons Per Day	N	Acres	B
Liters	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour	H	Pounds Per Hour	J	Hectares	O
Liters Per Day	V	Kilograms Per Hour	R	Hectare-meter	F
				Btu's Per Hour	R



### XII. Process - Codes and Design Capabilities (continued)

[illegible]

**XIII. Additional Treatment Processes (follow instructions from Item XII)**

EPA Form 3510 (Rev. 08-92) Previous edition is obsolete.

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved OMB No. 2050-0034 Expires 9-30-85  
GSA No. 0246-SPA-01

EPA I.D. Number (enter from page 1)	Secondary ID Number (enter from page 1)
L A R 0 0 0 0 0 3 4 8 3	

**XIV. Description of Hazardous Wastes**

- A. WASTE STREAM NUMBER** - Enter sequential waste stream number. A waste stream may be composed of one or more waste codes.
- B. ESTIMATED ANNUAL QUANTITY OF WASTE STREAM** - For each waste stream estimate the quantity of that waste that will be handled on an annual basis.
- C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

- D. WASTE CODES** - Enter the waste code for every waste in this waste stream.

**E. PROCESSES**

**1. PROCESS CODES**

**For listed hazardous waste:** For each listed hazardous waste stream entered in column A select the code(s) from the list of process codes contained in Item XII A, on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous waste:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A, on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

List all process codes that apply to this waste stream.

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form (E(2)).

**EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, and X-3 below)** - A facility will store and treat three waste streams. Waste stream 1 contains 550.10 tons of toxaphene which the facility intends to store in a tank. The facility estimates that waste stream 2 contains 2020.5 tons of hydrogen sulfide, lead, and wastewater treatment sludges generated in the production of creosote. These wastes will be held in storage containers and tanks, and then incinerated. The third waste stream (3) at the facility comprises an estimated 10.557 pounds of silver which will be stored in storage containers prior to being shipped off-site.

A. Waste Stream Number	B. Estimated Annual Quantity Of Waste	C. Unit Of Measure (enter code)	D. Waste Codes (for this waste stream)	E. Processes
				(1) Process Codes (for this waste stream)      (2) Process Description (if a code is not entered in E(1))
X-1	550.10	T	D018	S02
X-2	2020.5	T	U133      D008	S01      T02
			K035	S02
X-3	10.557	P	D011	S01

EPA Form 3510 (Rev. 09-82) Previous edition is obsolete.

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved OMB No. 7060-0034 Expires 6-30-87  
GSA No. 0746-GPA-07

EPA I.D. Number (enter from page 1)												Secondary ID Number (enter from page 1)											
L	A	R	O	O	O	O	3	4	8	3													

### XV. Map

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

### XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

### XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures, existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

### XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature <i>E. J. Schmitt</i>	Date Signed <i>6/26/97</i>
Name and Official Title (type or print) <i>X Secretary of State + Liaison Officer</i>	
Owner Signature	Date Signed
Name and Official Title (type or print)	
Operator Signature <i>Gerald E. Ritter</i>	Date Signed <i>June 25, 1997</i>
Name and Official Title (type or print) <i>Gerald E. Ritter, Senior Manager, Remediation/Waste Management</i>	
Operator Signature	Date Signed
Name and Official Title (type or print)	

### XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)

**A.1**

**LEGAL DESCRIPTION**



# FERRIS ENGINEERING & SURVEYING, INC.

CONSULTING ENGINEERS

BATON ROUGE, LOUISIANA

## PROPERTY DESCRIPTION

A certain tract or parcel of land located in Iberville Parish, Louisiana within the limits of that area known as Georgia Gulf Plant Site and as shown on "Survey Plat Showing Closure of North/South Organics Pond at Georgia Gulf Plant Site, Iberville Parish, Louisiana" prepared by Ferris & Associates Engineering, Inc., Ronald K. Ferris, P.L.S., dated November 6, 1989, and being described using Louisiana State Plane Coordinates, South Zone as follows:

COMMENCE at an "X" in concrete and labeled as point "A" on said survey; said point being located at X=2048104.7860, Y=582689.5920 and being the **POINT OF BEGINNING**;

THENCE PROCEED North 17°56'33" East a distance of 325.0021 feet to an iron pipe labeled as point "B" on said survey;

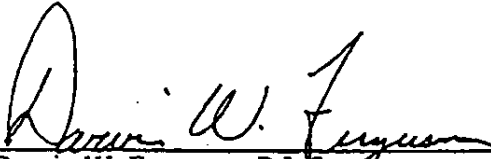
THENCE from point "B", which is located at X=2048204.9070, Y=582998.7880, proceed South 72°03'27" East a distance of 149.9958 feet to an iron pipe labeled as point "C" on said survey;

THENCE from point "C", which is located at X=2048347.6080, Y=582952.5800, proceed South 17°56'27" West a distance of 325.0190 feet to an iron pipe labeled as point "D" on said survey;

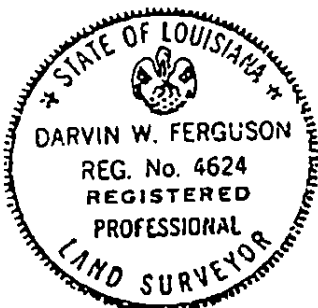
THENCE from point "D", which is located at X=2048247.4910, Y=582643.3650, proceed 72°03'04" West a distance of 150.0055 feet to the "X" in the concrete labeled as point "A" and the **POINT OF BEGINNING**.

The property being described above lies partially or wholly within the limits herein described and the area between points "A", "B", "C" and "D" contains 48,751.802 square feet or 1.119 acres.

The above description is based on the survey described in paragraph one (1) above and correctly describes this tract or parcel of land in accordance with said survey.

  
Darvin W. Ferguson, P.L.S.  
FERRIS ENGINEERING & SURVEYING, INC.

3/07/95  
Date

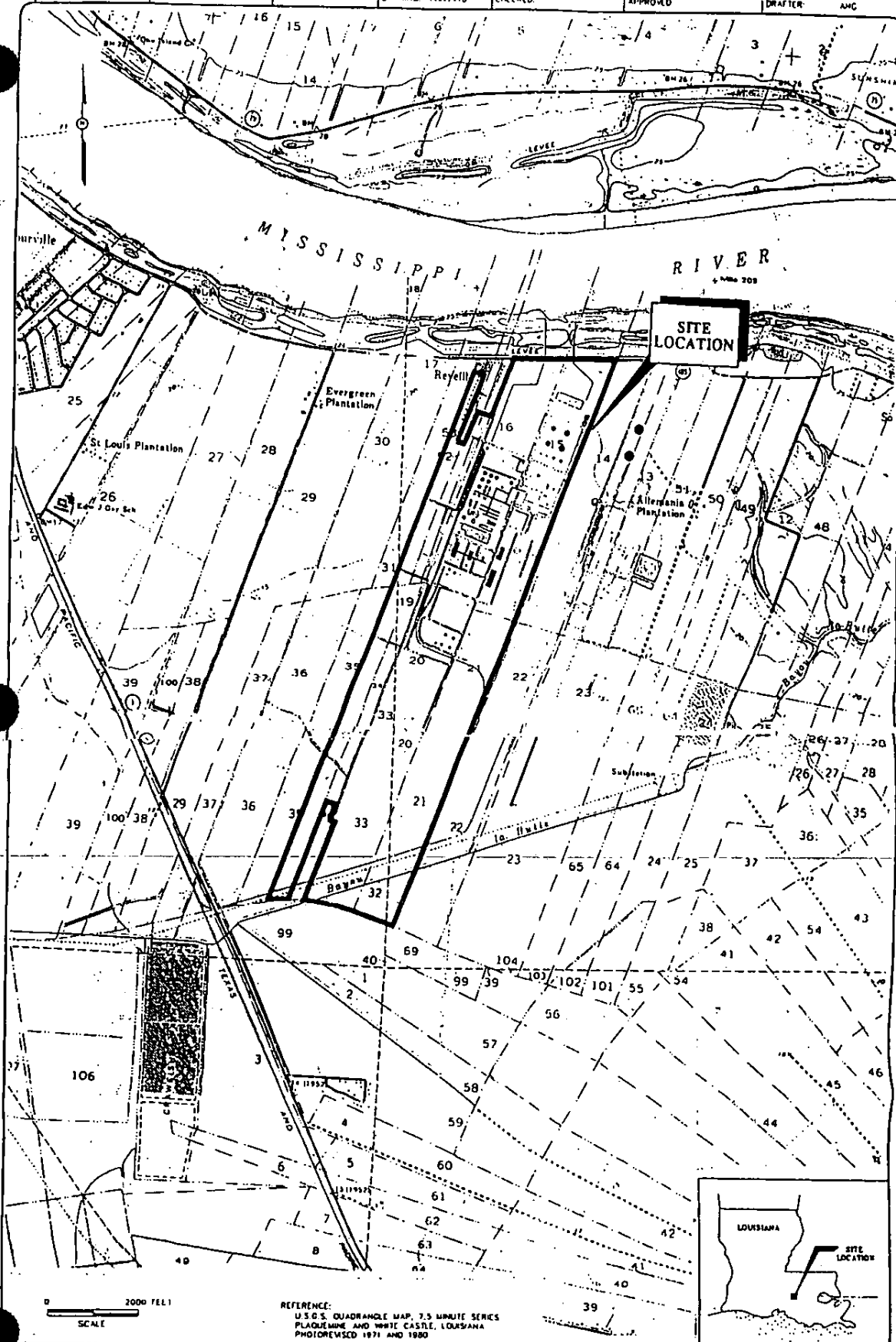


aniprtdoc/misdecedch

A.2

## TOPOGRAPHIC MAP



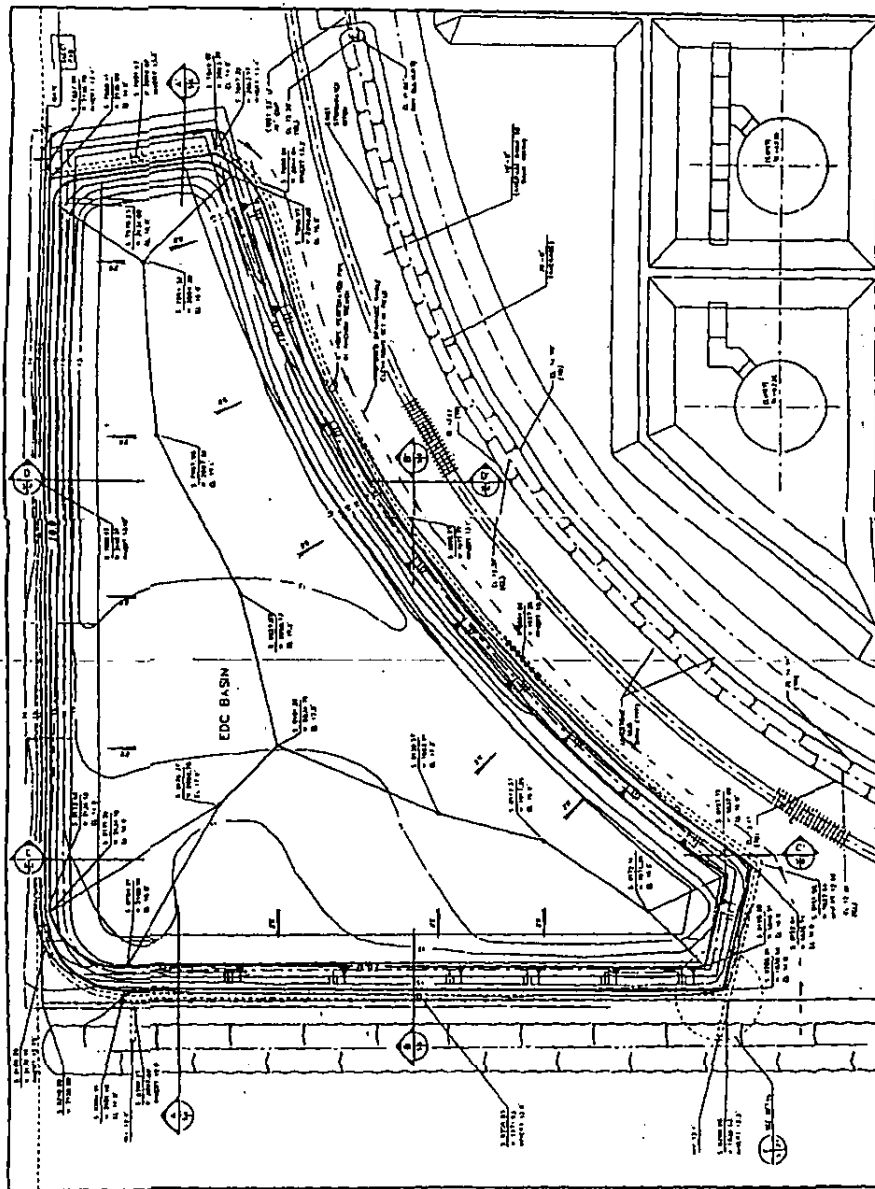




A.3

**FACILITY DRAWING**





**FINAL GRADING PLAN (EDC BASIN)**  
 CLOSURE PLAN FOR EDC BASIN & ASSOCIATED DITCHES  
**GEORGIA GULF PLANT**  
 Plaquemine, Louisiana

**GERAGHTY & MILLER, INC.**  
 Environmental Services

FIGURE  
 A-3



A.4

PHOTOGRAPHS



DATE: 6-26-97

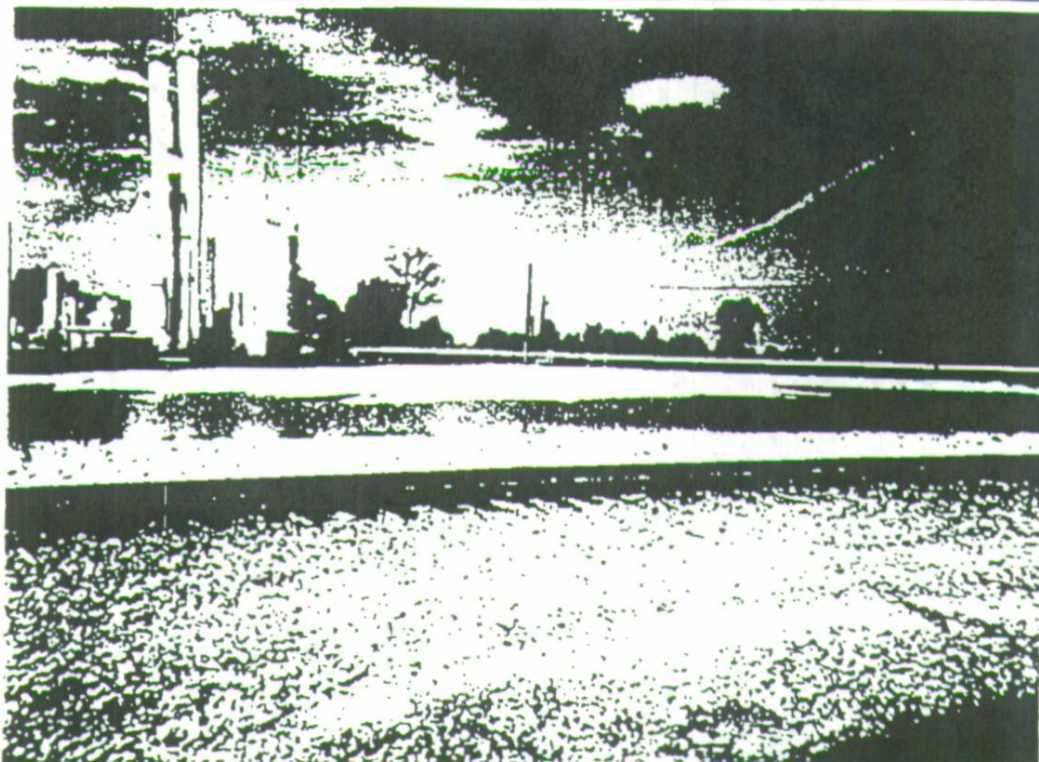
PROJECT NO.: LA1528.001

FILE NO.: MAC

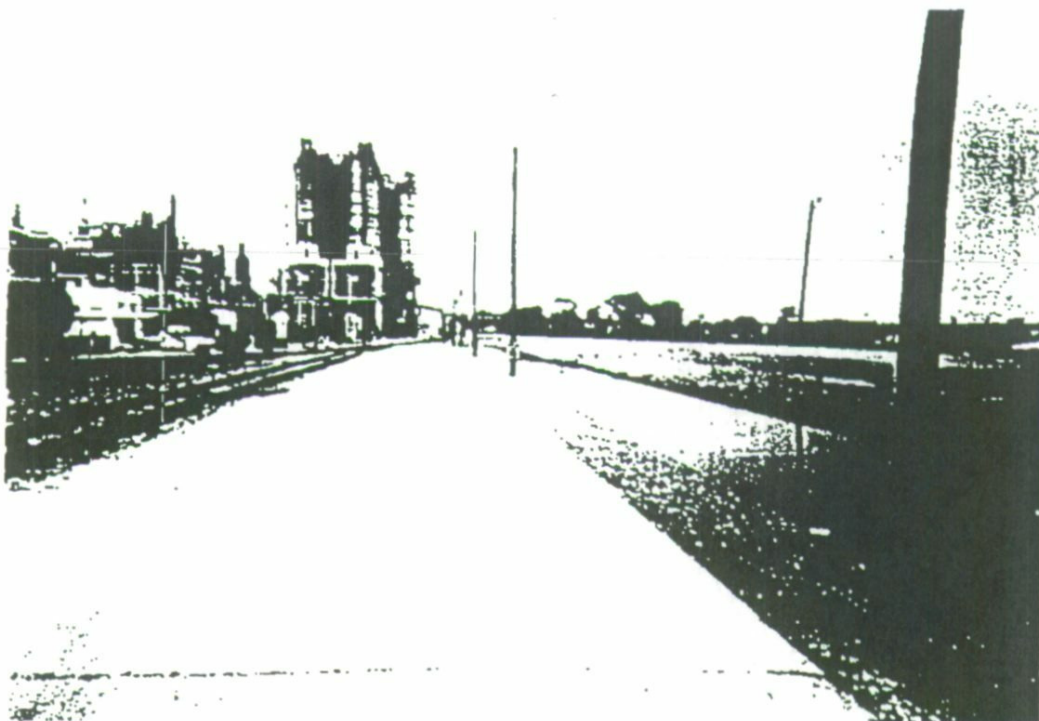
ISSUED: 6-26-97

APPROVED: [Signature]

CHECKED: [Signature]



EDC Basin looking southwest.



West Ditch from "C" Street looking south.

**GERAGHTY  
& MILLER, INC.**  
*Environmental Services*

**SITE PHOTOGRAPHS**  
**PRIOR TO CLOSURE**  
GEORGIA GULF CORPORATION  
Plaquemine, Louisiana

FIGURE

A.4



DRAFT

APPROVED

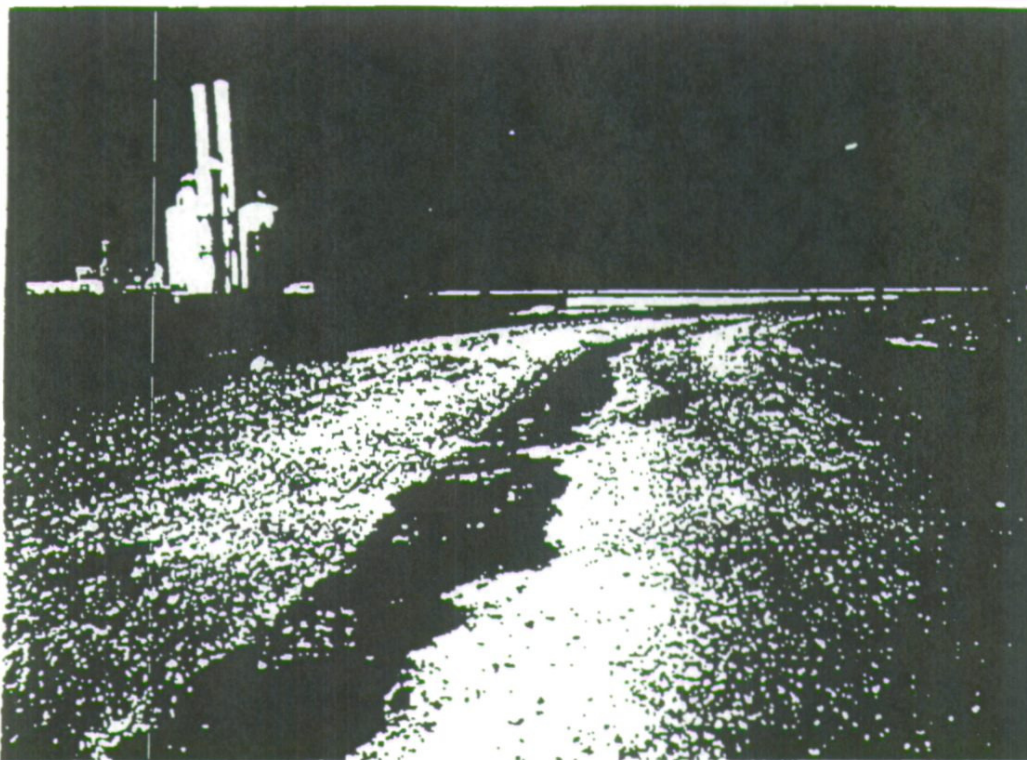
CHECKED

DRAWING

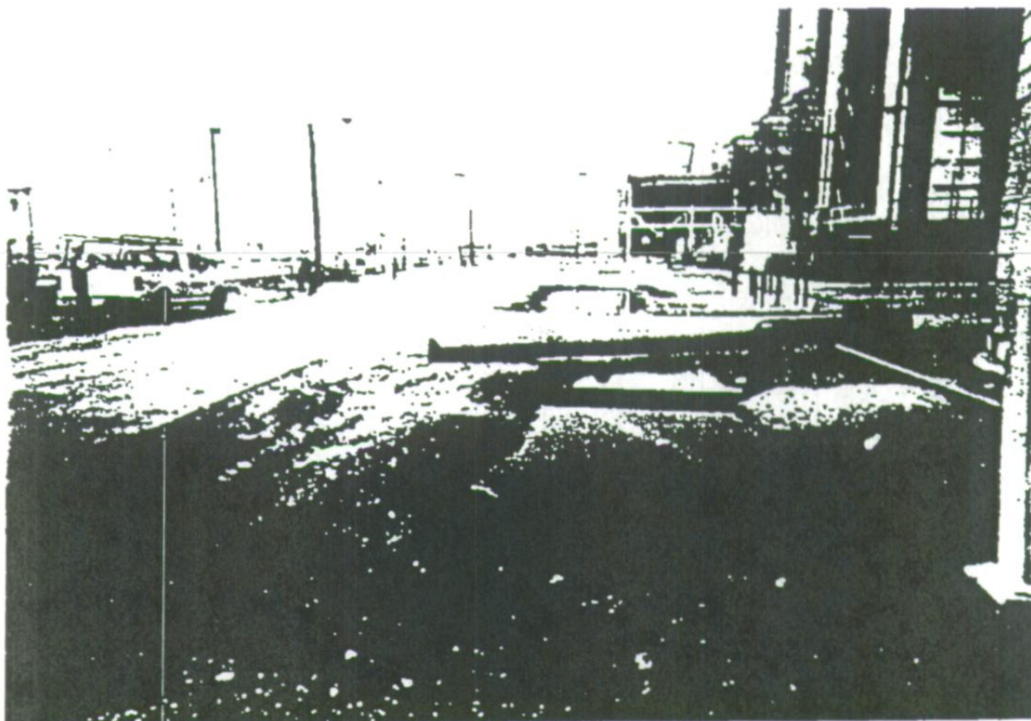
PROJECT NO.: LA1528.001 FILE NO.: MAC

DATE: 6-26-97

DW



"H" Street Ditch looking west.



"G" Street Ditch looking west.



## SITE PHOTOGRAPHS

PRIOR TO CLOSURE

GEORGIA GULF CORPORATION  
Plaquemine, Louisiana

FIGURE

A.4

# **TABLE OF CONTENTS**

## TABLE OF CONTENTS

I.	PERMIT PREAMBLE.....	1
II.	GENERAL PERMIT CONDITIONS.....	2
II.A.	DURATION OF PERMIT.....	2
II.B.	EFFECT OF PERMIT.....	2
II.C.	PERMIT ACTIONS.....	2
II.D.	SEVERABILITY.....	3
II.E.	DUTIES AND REQUIREMENTS.....	3
III.	GENERAL POST-CLOSURE CONDITIONS.....	15
III.A.	DESIGN AND OPERATION OF THE POST-CLOSURE UNIT.....	15
III.B.	GENERAL WASTE ANALYSIS.....	15
III.C.	SECURITY.....	15
III.D.	GENERAL INSPECTION REQUIREMENTS.....	15
III.E.	PERSONNEL TRAINING.....	15
III.F.	GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE.....	16
III.G.	LOCATION STANDARDS.....	16
III.H.	PRECIPITATION RUN-ON AND RUN-OFF.....	16
III.I.	HURRICANE EVENTS.....	16
III.J.	PREPAREDNESS AND PREVENTION.....	17
III.K.	CONTINGENCY PLAN.....	17
III.L.	MANIFEST SYSTEM.....	17
III.M.	RECORD KEEPING AND REPORTING.....	18
III.N.	POST-CLOSURE.....	18
III.O.	COST ESTIMATE FOR CARE OF POST-CLOSURE UNIT.....	18
III.P.	FINANCIAL ASSURANCE FOR FACILITY CLOSURE.....	18
III.Q.	LIABILITY REQUIREMENTS.....	19
III.R.	INCAPACITY OF THE PERMITTEE.....	19
IV.	PERMITTED CLOSED UNITS.....	20
V.	PERMIT CONDITIONS APPLICABLE TO PERMITTED CLOSED UNITS.....	20
V.A.	POST-CLOSURE CARE PERIOD.....	20
V.B.	POST-CLOSURE MAINTENANCE.....	20
V.C.	POST-CLOSURE RESTRICTIONS.....	21
V.D.	POST-CLOSURE PROPERTY OF SITE USE.....	21
V.E.	POST-CLOSURE CONTACT.....	22
V.F.	POST-CLOSURE NOTICES.....	22
V.G.	CERTIFICATION OF COMPLETION OF POST-CLOSURE CARE.....	22
VI.	GROUNDWATER PROTECTION.....	23

# **BODY OF PERMIT**



**FINAL  
MODIFIED POST-CLOSURE PERMIT**

**Georgia-Pacific Corporation  
EDC Basin and Associated Ditches  
EPA ID# LAR 000 003 483  
Agency Interst# 25738**

**Iberville Parish  
Plaquemine, Louisiana  
PER20070002**

**I. PERMIT PREAMBLE**

This modified permit is issued by the Louisiana Department of Environmental Quality (LDEQ) and the United States Environmental Protection Agency (USEPA) under the authority of the Louisiana Hazardous Waste Control Law R.S. 20:2171 et seq., and the regulations adopted thereunder and by the EPA under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to Resource Conservation and Recovery Act (RCRA) to Georgia-Pacific Corporation, Plaquemine, Iberville Parish, Louisiana, LAR 000 003 483, hereafter referred to as the "Permittee."

For the purposes of this permit, "Administrative Authority" shall mean the Secretary of the Department of Environmental Quality, or his/her designee.

This permit is based on information submitted in the permit application, and all subsequent amendments, and on the certification that the applicant will maintain, inspect, and monitor the facility as specified in the application. Any inaccuracies found in the information submitted may be grounds for the termination or modification of this permit and potential enforcement action.

This permit is conditioned upon full compliance with all applicable provisions of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et seq., and the regulations adopted thereunder.

All definitions contained in the permit shall have the meaning as defined in Title 33, Part V, Subpart 1, of the Louisiana Administrative Code unless otherwise stated herein.

## II. GENERAL POST-CLOSURE PERMIT CONDITIONS

### II.A. DURATION OF PERMIT

This permit is effective as of the date indicated on the accompanying signature page and shall remain in effect for a period of ten (10) years from the effective date, in accordance with LAC 33:V.315, unless revoked, reissued, modified or terminated for just cause. The Permittee must reapply, during the remaining post-closure care period, 180 days prior to the expiration of each ten (10) year permit, in accordance with LAC 33:V.303.N, until the full post-closure period has been satisfied. This permit will be reviewed by the Administrative Authority five (5) years after the date of permit issuance and will be modified, suspended, or terminated, as necessary, as provided in 40 CFR 270.41 and LAC 33:V.323.

### II.B. EFFECT OF PERMIT

In accordance with LAC 33:V.4389.A, the Permittee is required to conduct post-closure care and corrective action for possible groundwater contamination for a period of thirty (30) years, in accordance with the permit, unless amended by the Administrative Authority. Any management of hazardous waste not authorized by statute, regulation, this permit, or a LAC 33:V, Subpart I operating permit is prohibited. Compliance with this permit during its term constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA and Part V of the Louisiana Environmental Quality Act (Act). However, compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, or under Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) [42 U.S.C. 9606 (a)].

In accordance with LAC 33:V.307.B and C, issuance of the permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local laws or regulations.

### II.C. PERMIT ACTIONS

The Administrative Authority may terminate a permit during its term or deny a permit renewal application, in accordance with LAC 33:V.323.B.3, resulting from the Permittee's failure, in the permit application or during the permit issuance process, to disclose fully all relevant facts, or the Permittee's misrepresentation of any relevant facts at any time.

Any inaccuracies found in the post-closure permit application may be cause for revocation or modification of the permit. The Permittee must inform the

Administrative Authority of any deviation, changes in, or inaccuracies in the permit application information.

The Administrative Authority may also suspend, modify, revoke and reissue, or terminate the permit for cause as specified in 40 CFR 270.41, 270.42, 270.43 or LAC 33:V.309.F, 311.A, or 323. The Administrative Authority may modify the permit when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations, or by judicial decision after the permit was issued. The filing of a request for permit modification, revocation, reissuance and termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

#### II.D. SEVERABILITY

The conditions of this permit are severable, and if any provision of the permit, or the application of any provision of the permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of the permit shall not be affected thereby.

#### II.E. DUTIES AND REQUIREMENTS

##### II.E.1. Duty to Comply

As required by LAC 33:V.309.A, the Permittee must comply with all conditions of this permit, except to the extent and for the duration such noncompliance may be authorized by an emergency permit, described in LAC 33:V.701. Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of LAC 33:V, Subpart 1, the Act and this permit, and is grounds for enforcement action, permit termination, permit revocation and reissuance, permit modification, or denial of a permit renewal application.

##### II.E.2. Duty to Reapply

If the Permittee wishes to continue an activity regulated by the permit after the expiration date of this permit, the Permittee must reapply for the permit as required by LAC 33:V.303.N and 40 CFR 264.117(a)(1).

##### II.E.3. Permit Extension

The permit and all conditions herein will remain in effect beyond the permit's expiration date, in accordance with LAC 33:V.309.B, until the Administrative Authority issues a final decision.

II.E.4. Need to Halt or Reduce Activity Not a Defense

That it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit shall not be a defense for the Permittee in an enforcement action, in accordance with LAC 33:V.309.C.

II.E.5. Duty to Mitigate

The Permittee must immediately take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with the permit, in accordance with LAC 33:V.309.D.

II.E.6. Proper Operation and Maintenance

The Permittee must at all times properly maintain the EDC basin, the associated ditches and systems of treatment, monitoring and control (and related appurtenances) that are installed or used by the Permittee to achieve compliance with the conditions of the permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit, in accordance with LAC 33:V.309.E. These closed units are to be maintained in accordance with Condition V.A. of the permit.

II.E.7. Duty to Provide Information

The Permittee must furnish to the Administrative Authority, within a reasonable time, any information which may be requested to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. The Permittee must also furnish to the Administrative Authority, upon request, copies of records required by the permit in accordance with LAC 33:V.309.H.

II.E.8. Inspection and Entry

The Permittee must allow the Administrative Authority or an authorized representative, upon the presentation of credentials and other documents as may be required by law in accordance with LAC 33:V.309.I, to:

- II.E.8.a. enter upon the Permittee's premises where a regulated activity is located or conducted, or where records must be maintained under the conditions of the permit;

- II.E.8.b. have access to and copy, at reasonable times, any records that must be maintained under the conditions of the permit;
- II.E.8.c. inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the permit; and
- II.E.8.d. sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Administrative Authority any substances or parameters at any location covered by this permit. The Permittee must be allowed to split samples with the Administrative Authority (or its authorized representative) and to observe any monitoring by the Administrative Authority (or its authorized representative) during any sampling or monitoring that is conducted under this section.

II.E.9. Monitoring and Records

- II.E.9.a. Samples and measurements taken for the purpose of monitoring must be representative of the monitored activity. The method to be used by the laboratory for analysis or the method used to obtain a representative sample of the waste to be analyzed must be the appropriate method specified from Appendix I of 40 CFR Part 261, Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, Third Edition, 1986, as revised; Manual of Ground Water Quality Sampling Procedures, 1981, EPA-600/2-81-160, as revised; Procedures Manual for Ground Water Monitoring at Solid Waste Disposal Facilities, 1977, EPA-530/SW-611, as revised; or an equivalent method as approved by the Administrative Authority.
- II.E.9.b. Records of monitoring information must include:
  - II.E.9.b.i. the date, exact place, and time of sampling or measurements;
  - II.E.9.b.ii. the name (signature) of the individual(s) who performed the sampling or measurements;
  - II.E.9.b.iii. the date(s) analyses were performed;
  - II.E.9.b.iv. the name (signature) of the individual(s) who performed the analysis.

II.E.9.b.v. the analytical techniques or methods used;

II.E.9.b.vi. the results of such analyses; and

II.E.9.b.vii. the associated quality assurance performance data.

II.E.10. Retention of Records

The Permittee must maintain records from all groundwater monitoring wells and associated groundwater surface elevations covered by this permit during the post-closure care period.

The Permittee must retain records of all monitoring information, including all calibration, maintenance records and copies of all reports and records required by the permit, for a period of at least three (3) years from the date of the sample, measurement, report, or record, except where otherwise required by the permit, or by order of the Administrative Authority. The Permittee must, for the life of the permit, maintain records of all data for the permit and any supplemental information submitted under the hazardous waste program of Louisiana. These periods may be extended by request of the Administrative Authority at any time and are automatically extended during the course of any unresolved enforcement action regarding the EDC basin and associated ditches.

II.E.11. Notices of Planned Physical Permitted Unit Changes

The Permittee must give notice to the Administrative Authority, as soon as possible, of any planned physical alterations or additions to the EDC basin and associated ditches, in accordance with LAC 33:V.309.L.1.

II.E.12. Closed Unit after Modification or Construction

For a closed unit being modified, the Permittee may not manage hazardous waste in the modified portion of the closed unit until the Permittee has submitted to and received approval of the Administrative Authority, by certified mail or hand delivery, a letter signed by the Permittee and an independent registered professional engineer stating that the closed unit modification has been constructed or modified in compliance with the permit.

II.E.13. Anticipated Noncompliance

The Permittee must give advance notice to the Administrative Authority of any planned changes in the EDC basin and associated ditches, or activity that may result in noncompliance with permit requirements.

II.E.14. Transfer of Permits

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to LAC 33:V.309.L.4, 3213, 321.C.4, and 1531. Before transferring ownership or operation of the EDC basin and associated ditches, during the post-closure care period, the Permittee must notify the new owner or operator in writing of all the requirements of LAC 33:V, Subpart 1.

II.E.15. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule (Condition II.E.21 - Schedule of Compliance) of the permit must be submitted no later than fourteen (14) days following each schedule date.

II.E.16. Noncompliance Reporting

The Permittee must report orally within twenty-four hours any noncompliance with the permit that may endanger human health or the environment, except where more immediate notification is required by LAC 33:1.3901, the "Notification Regulations and Procedures for Unauthorized Discharges" dated August 20, 1993, as amended. This report must include the following:

II.E.16.a. information concerning the release of any hazardous waste from the EDC basin and associated ditches that may endanger public drinking water supplies; and

II.E.16.b. information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the permitted closed unit, that could threaten the environment or human health outside the facility. The description of the occurrence and its cause must include:

II.E.16.b.i. the name, address, and telephone number of the owner or operator;

II.E.16.b.ii. the name, address, and telephone number of the facility;

II.E.16.b.iii. the date, time, and type of incident;

II.E.16.b.iv. the name and quantity of materials involved;

II.E.16.b.v. the extent of injuries, if any;

II.E.16.b.vi. an assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

II.E.16.b.vii. the estimated quantity and disposition of recovered material that resulted from the incident.

II.E.17. Follow-up Written Report of Noncompliance

The Permittee must provide a written submission within five (5) working days after the time the Permittee becomes aware of any noncompliance which may endanger human health or the environment. However, where more immediate submission is required by LAC 33:I.3901, the "Notification Regulations and Procedures for Unauthorized Discharges" dated August 20, 1993, the report must be submitted in accordance with those regulations. The written submission must contain a description of the noncompliance and its cause; name and quantity of materials involved; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five (5) working days written notice requirement if the Administrative Authority waives the requirement and the Permittee submits a written report within fifteen (15) working days after the time the Permittee becomes aware of the circumstances.

II.E.18. Other Noncompliance

The Permittee must report all instances of noncompliance, not otherwise required to be reported above, at the time required monitoring reports are submitted. The reports must contain the information listed in Permit Condition II.E.16.

II.E.19. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or that it submitted incorrect information in a permit application, or in any report to the Administrative Authority, the Permittee must promptly submit such facts or information.

II.E.20. Signatory Requirement

All applications, reports or other information submitted to the Administrative Authority must be signed and certified according to LAC 33:V.507, 509, 511, and 513.



## II.E.21. Schedule of Compliance

The Permittee has completed all closure activities in accordance with the approved closure plan and submitted a closure certification pertaining to the EDC basin and associated ditches by an independent registered professional engineer. The Closure certification has been accepted by the Department. See as Attachment A.

- II.E.21.a. Within ninety (90) days following the effective date of this permit, the Compliance Monitoring Program must be initiated, which includes developing background data from a sequence of four quarterly sampling events utilizing upgradient monitor wells 10A, 10B, and 10C. Data for monitor well 10A will establish the background data for Stratum III groundwater, as will monitor well 10B for Stratum IVB, and monitor well 10C for Stratum V. A sequence of at least four samples from each upgradient well and downgradient (monitor and point of compliance) wells must be collected quarterly. The monitor wells as designated in permit Table 2 will be analyzed quarterly for the monitoring parameters in Table 1 of this permit. The point of compliance wells designated in permit Table 2 will be analyzed quarterly for permit Table 1 monitoring parameters and annually for LAC 33:V.3325-Table 4 constituents.

Data for each monitoring parameter from the aforementioned sampling and analyses events will be compared with specific concentration limits defined by the groundwater protection standards. The decision must be made to use either the parametric or nonparametric analysis of variance (ANOVA) or tolerance or prediction interval procedure. Any statistical method chosen must comply with the performance standards set forth in LAC 33:V.3315.I.1-6.

- II.E.21.b. Within ninety (90) days following the effective date of this permit, a revised Groundwater Sampling and Analysis Plan must be submitted that fulfills the conditions of this permit and outlines the statistical method(s) to be used for the analysis of groundwater data collected in the Permittee's compliance monitoring program. The plan must be a stand-alone document that is specific to this permit and must be available at the facility for inspection and must include, at a minimum:

- II.E.21.b.i. sampling frequency and wells to be sampled;

- II.E.21.b.ii. analytical parameters and methodology, including Method Detection Limits (MDL's) and/or Practical Quantitation Limits;
- II.E.21.b.iii. groundwater sampling procedures, water level measurements, detection of Non-Aqueous Phase Liquids (NAPLs), calibration and use of field instruments, well evacuation, the order in the which samples are collected, sample containerization, sample preservation and holding times, field documentation, and decontamination procedures;
- II.E.21.b.iv. chain-of-custody procedures;
- II.E.21.b.v. quality assurance/quality control (QA/QC) for sampling and analytical procedures;
- II.E.21.b.vi. statistical methodology for interpretation of groundwater monitoring data, including a detailed discussion of how the proposed method satisfies the requirements of LAC 33:V.3315.H, the performance standards of LAC 33:V.3315.H, and the performance standards of LAC 33:V.3315.I.
- II.E.21.b.vii. facility map that outlines the EDC Basins and associated ditches. Labels must be included on this map to denote G Street, H Street and the unnamed ditch that borders the EDC Basin. Additionally, the plan must also include a map that designates all monitoring well locations.

The Groundwater Sampling and Analysis Plan, upon approval by the Department, must be inserted as Attachment B of this permit. In the event that it is determined that the approved Sampling and Analysis Plan requires revisions, the Permittee may submit a request for a Class 1 permit modification, per LAC 33:V.322.C.2, describing the necessary revisions to the Administrative Authority for approval.

- II.E.21.c. Within 180 days following the effective date of this permit, the Permittee must submit a comprehensive Corrective Action Plan (CAP), for review and approval by the Department, which includes a complete description of all proposed corrective action systems, pursuant to LAC 33:V.3303, 3319, and 3321. Within sixty (60)

days of completion of any required well installations and sampling events, the Permittee must modify the CAP to incorporate all new wells, sampling parameters, etc., which may result from additional investigations, installations, etc. at the site. If at any time it is determined by the Permittee that changes to the corrective action system are necessary, the Permittee must submit to the Department for approval, a proposal for modification of the CAP within sixty (60) days of the modification, as appropriate. Additional wells that are required due to the CAP modification will be described as Plume Defining wells and will be treated as Point of Compliance wells for monitoring purposes. The Permittee must implement a corrective action program that prevents hazardous constituents from exceeding their respective concentration limits at the compliance point. The proposed CAP must include the following, at a minimum:

- II.E.21.c.i. a site map and geologic cross-sections that relate the subsurface geology of the site to the well system. Cross-sections are to be constructed from data collected from soil borings and well logs. The usual requirements for cross-sections are that they must extend downward to the next permeable zone beneath the zone in which contamination is currently known to exist. In this case, the next permeable zone beneath Stratum V is the Plaquemine Aquifer, so the cross-sections must extend into Stratum VI. Well construction details for all wells must be included.
- II.E.21.c.ii. the CAP must include the data that has been generated, including detailed characterizations of the permeable zones beneath the site that encompass local thickness, area extent, hydraulic conductivity, potentiometric surface, flow directions, and flow velocity for each of these units.
- II.E.21.c.iii. a updated, detailed characterization of the plumes of contamination for each zone, including horizontal and vertical extent, constituents and concentrations. This updated information must be shown in the form of plan view maps that show contaminants present in the groundwater beneath the site and contaminant isopleths for each permeable zone.
- II.E.21.c.iv. a detailed description and schedule for corrective actions that will achieve compliance with the

groundwater protection standard specified in condition VI.D of this permit under LAC 33:V.3319.A.

II.E.21.c.v. a geotechnical plan (certified by a qualified geologist or a geotechnical engineer) to demonstrate the effectiveness of the planned corrective actions. This plan may incorporate the compliance monitoring program developed to meet the requirements of this permit, except that the Permittee will be required to monitor as frequently as necessary (as required in Condition VI.J.1) to assure that sufficient data will be generated for demonstrating the effectiveness of the correction actions.

II.E.21.c.vi. provisions for the submittal of semi-annual reports to the Department demonstrating the effectiveness of the corrective actions, as required by condition VI.J of this permit.

II.E.22. Updated Documents To Be Submitted Prior To Operation

[RESERVED]

II.E.23. Documents To Be Maintained at Facility Site

II.E.23.a. The Permittee must maintain at the facility, until the post-closure care period is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions, and modifications to these documents. The documents should include the following:

II.E.23.a.i. a Sampling and Analysis Plan;

II.E.23.a.ii. a Contingency Plan submitted in accordance with LAC 33:V.1117;

II.E.23.a.iii. any post-closure care requirements that may be required initially or through permit modifications in accordance with LAC 33:V.3523;

II.E.23.a.iv. a cost estimate for the EDC basin and associated ditches post-closure care submitted in accordance with LAC 33:V.3709;

- II.E.23.a.v. any post-closure cost estimate that may be required initially or through permit modifications in accordance with LAC 33:V.3709;
- II.E.23.a.vi. a Corrective Action Report, if the facility is required to establish a corrective action program under LAC 33:V.3321 and Condition VI, "Ground Water Protection";
- II.E.23.a.vii. any inspection schedules developed in accordance with LAC 33:V.517.G, 1509,, and 3523;
- II.E.23.a.viii. financial assurance developed in accordance with LAC 33:V.3707 and 3711;
- II.E.23.a.ix. a copy of the most recent annual report;
- II.E.23.a.x. post-closure permit for the EDC basin and associated ditches; and
- II.E.23.a.xi. the training plan and records for facility personnel performing the actual post-closure care, monitoring and maintenance, who may come in contact with or be expected to respond to an emergency involving hazardous waste.

II.E.23.b. All proposed amendments, revisions and modifications to any plan or cost estimates required by the permit must be submitted to the Administrative Authority for approval in accordance with LAC 33:V.321, 322, and 323. Any approved amendments to these documents supersede those documents maintained at the facility.

#### II.E.24. Annual Report

An annual report, due March 1 each year, covering the closed EDC basin and associated ditches, and their activities during the previous calendar year as required by LAC 33:V.1529.D.

#### II.E.25. Manifest

[RESERVED]

II.E.26. Non-Listed Hazardous Waste Units

This post-closure permit is issued for the hazardous waste units listed in Condition IV, "Permitted Closed Units". If the Permittee determines that an unpermitted hazardous waste unit exists, the Permittee must promptly notify the Administrative Authority in accordance with Condition II.E.19 of the General Permit Conditions of this permit.

II.E.27. Point Source Discharges

II.E.27.a. Air emissions, if any, must be in conformity with air limitations of the Clean Air Act administered by the Department of Environmental Quality. The Permittee must comply with the operating and reporting conditions required of any air permit.

The air permit must be applied for prior to the issuance of a hazardous waste permit in accordance with LAC 33:V.1505.A.2.

II.E.27.b. Water discharges, if any, must conform with effluent limitations established by the Clean Water Act operating under a National Pollutant Discharge Elimination Systems (NPDES) permit and reported as required by that permit in accordance with LAC 33:V.1505.A.1

II.E.28. Compliance With Land Disposal Restrictions

The Permittee must comply with those land disposal restrictions set forth in La. R.S. 30:2193 and all regulations promulgated thereunder.

### III. GENERAL POST-CLOSURE CONDITIONS

#### III.A. DESIGN AND OPERATION OF THE POST-CLOSURE UNIT

III.A.1. The Permittee must maintain the EDC basin and associated ditches to minimize the possibility of a fire, explosion, or any unauthorized sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or water that could threaten human health or the environment.

III.A.2. The Permittee must not manage any new wastes in the EDC basin and associated ditches.

#### III.B. GENERAL WASTE ANALYSIS

[RESERVED]

#### III.C. SECURITY

The Permittee must comply with the security provisions of LAC 33:V.1507.

#### III.D. GENERAL INSPECTION REQUIREMENTS

The Permittee must follow the Inspection Schedule referenced in Condition II.E.23.a.vii. The Permittee must remedy any deterioration or malfunction discovered by an inspection as required by LAC 33:V.1509.C. Records of inspections must be kept as required by LAC 33:V.1509.D. The inspection schedule must include the regulatory requirements of LAC 33:V.517.G, 1509.A and B, and 3523.

#### III.E. PERSONNEL TRAINING

The Permittee must conduct personnel training as required by LAC 33:V.1515.A, B, and C. The Permittee must maintain all training documents and records as required by LAC 33:V. 1515.D and E.

#### III.F. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee must take precautions as required by LAC 33:V.1517 to prevent accidental ignition or reaction of ignitable or reactive wastes.

### III.G. LOCATION STANDARDS

- III.G.1. The Permittee has furnished evidence that it is in compliance with seismic standards as required by LAC 33:V.517.T.
- III.G.2. The Permittee must not manage any hazardous waste on any portion of the property that lies within the 100 year flood plain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action, soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3. Such site improvements must be certified by independent licensed professional engineers and approved by LDEQ prior to any hazardous waste and/or hazardous waste units being placed thereon.

### III.H. PRECIPITATION RUN-ON AND RUN-OFF

The Permittee must provide for the control by diversion or treatment of run-on and run-off resulting from a rainfall of at least twelve (12) inches, occurring during a period of twenty-four (24) hours in conformity with locally available records of a twenty-four (24) hour rainfall as per LAC 33:V.1503.B.2.

### III.I. HURRICANE EVENTS

The Permittee must initiate those applicable portions of the Contingency Plan during a hurricane as well as appropriate actions required by the Administrative Authority.

### III.J. PREPAREDNESS AND PREVENTION

#### III.J.1. Required Equipment

At a minimum, the Permittee must install and maintain the equipment set forth in the Contingency Plan, as required by LAC 33:V.1511.C.

#### III.J.2. Testing and Maintenance of Equipment

The Permittee must test and maintain the equipment specified in Condition III.J.1 to insure its proper operation in time of emergency. The testing and maintenance of the equipment must be documented in the operating record.



III.J.3. Access to Communications or Alarm Systems

The Permittee must maintain access to the communications or alarm system as required by LAC 33:V.1511.E.1 and 1511.E.2.

III.K. CONTINGENCY PLAN

III.K.1. Implementation of Plan

The Permittee must immediately carry out the provisions of the Contingency Plan, and follow the emergency procedures described by LAC 33:V.1513.F whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that threaten or could threaten human health or the environment.

III.K.2. Copies of Plan

The Permittee must comply with the requirements of LAC 33:V.1513.C.

III.K.3. Amendments to Plan

The Permittee must review and immediately amend, if necessary, the Contingency Plan as required by LAC 33:V.1513.D.

III.K.4. Emergency Coordinator

The Permittee must comply with the requirements of LAC 33:V.1513.E, and 322.B.6 concerning the emergency coordinator.

III.L. MANIFEST SYSTEM

[RESERVED]

III.M. RECORD KEEPING AND REPORTING

III.M.1. Operating Record

[RESERVED]

III.M.2. Annual Report

The Permittee must comply with the annual report requirements of LAC 33:V.1529.D.

III.M.3 Quarterly Groundwater Monitoring Report

The Permittee must submit a Quarterly Groundwater Monitoring Report for each quarterly groundwater sampling event.

III.N. POST-CLOSURE

III.N.1. Post-Closure Permit

The Permittee must manage the EDC basin and associated ditches in accordance with this permit, and LAC 33:V.3523.

III.N.2. Amendment to Post-Closure Permit

The Permittee must request modification to this Post-Closure Permit when necessary, in accordance with LAC 33:V.3523.D. and LAC 33:V.321.

III.O. COST ESTIMATE FOR CARE OF THE POST-CLOSURE UNIT

III.O.1. The Permittee must maintain a cost estimate for post-closure care of the EDC basin and associated ditches as required by LAC 33:V.3709.

III.O.2. The Permittee must maintain and adjust the post-closure cost estimate for inflation, as specified in LAC 33:V.3709.B, C, D, and for other circumstances that increase the cost of post-closure.

III.O.3. The Permittee must base all post-closure cost estimates on the assumption that a third party contractor performs post-closure monitoring and maintenance in accordance with LAC 33:V.3709.A.

III.O.4. The Permittee must consider the inventory and process conditions and their impact on the post-closure cost estimate for any resubmittal.

III.P. FINANCIAL ASSURANCE FOR THE POST-CLOSURE UNIT

III.P.1. As specified in LAC 33:V.3711, financial assurance for post-closure care of the facility must be established prior to the initial receipt of hazardous waste or the effective date of the regulation, whichever is later, and maintained throughout the active life of the facility and post-closure care period.

III.P.2. Throughout the active life of the facility, the Permittee must adjust and revise its post-closure cost estimates, as necessary, to comply with the provisions of LAC 33:V.3709.

III.P.3. Throughout the post-closure care period, the Permittee must provide updates for its financial assurance mechanisms, as necessary, to comply with the provisions of LAC 33:V.3711.

III.P.4. During the life of the facility, the Permittee must keep, at the facility, its latest post-closure cost estimates, as necessary, to comply with LAC 33:V.3709.D.

### III.Q. LIABILITY REQUIREMENTS

[RESERVED]

### III.R. INCAPACITY OF THE PERMITTEE

The Permittee must comply with LAC 33:V.3717 whenever bankruptcy is initiated for the Permittee or its institutions providing financial assurance. If insurance is used for compliance with LAC 33:V.3715, the Permittee must immediately notify the Administrative Authority if the insurance company is placed in receivership.

#### **IV. PERMITTED CLOSED UNITS**

This permit is applicable only to the units known as the EDC Basin and Associated Ditches (West ditch, G Street ditch, H Street ditch and Unnamed ditch) located on the property of Georgia Gulf facility, Plaquemine, Iberville Parish, Louisiana. The previous owner of Georgia Gulf facility, Georgia-Pacific Corporation, is retaining responsibility for certain environmental liabilities associated with these units. These units are located in the southwestern area of the facility. This permit also applies to any appurtenances associated with these units. The appurtenances are defined as any run-on/run-off control systems, leachate collection/leak detection systems, tanks, and/or piping and instrumentation associated with these regulated units. If any additional appurtenances are added in the future they would be addressed through a permit modification as required by regulation and this permit.

#### **V. PERMIT CONDITIONS APPLICABLE TO PERMITTED CLOSED UNITS**

##### **V.A. COVER MAINTENANCE**

The Permittee must maintain the cover over the EDC basin and associated ditches, with a final cover designed, constructed and maintained to:

- V.A.1. provide long-term minimization of migration of liquids through EDC basin and associated ditches;
- V.A.2. function with minimal maintenance;
- V.A.3. promote drainage and minimize erosion or abrasion of the final cover;
- V.A.4. accommodate settling and subsidence so that the cover's integrity is maintained; and
- V.A.5. have a permeability less than or equal to the permeability of any bottom liner system or natural subsoils present.

##### **V.B. POST-CLOSURE CARE PERIOD**

The post-closure care period will be in effect for the period of thirty (30) years, unless extended or shortened by the Administrative Authority, as specified in LAC 33:V.3521.A.1 and 2, Post-Closure-Maintenance. After final closure, the owner or operator must comply with all post-closure requirements contained in LAC 33:V.3519 through 3527, including maintenance and monitoring throughout the post-closure care period specified in the permit under LAC 33:V.3521.A.1. The owner or operator must:

- V.B.1. maintain the integrity and effectiveness of the final cover, including making repairs to the cap as necessary to correct the effects of settling, subsidence, erosion, or other events;
- V.B.2. maintain and monitor the groundwater monitoring system and comply with all other applicable requirements of LAC 33:V, Chapter 33;
- V.B.3. prevent run-on and run-off from eroding or otherwise damaging the final cover; and
- V.B.4. protect and maintain surveyed benchmarks used in complying with LAC 33:V, Chapter 33.

V.C. POST-CLOSURE RESTRICTIONS

The Administrative Authority may require, at partial and final closure, continuation of any of the security requirements of LAC 33:V.1507, during part or all of the post-closure period when access by the public or domestic livestock may pose a hazard to human health.

V.D. POST-CLOSURE PROPERTY OR SITE USE

- V.D.1. Post-closure use of property on or in which hazardous wastes remain after partial or final closure must never be allowed to disturb the integrity of the final cover, liner(s), or any other components of the containment system, or the function of the permitted closed unit's monitoring systems, unless the Administrative Authority finds that the disturbance:
  - V.D.1.a. is necessary to the proposed use of the property, and will not increase the potential hazard to human health or the environment; or
  - V.D.1.b. is necessary to reduce a threat to human health or the environment.
- V.D.2. Any post-closure activity other than that specified in this permit must have prior approval of the Administrative Authority.

V.E. POST-CLOSURE CONTACT

The Permittee must provide the name, address, and phone number of the person or office to contact about the EDC Basin and Associated Ditches during the post-closure care period.

V.F. POST-CLOSURE NOTICES

If the Permittee or any subsequent Permittee of the land upon which this hazardous waste disposal unit is located wishes to remove hazardous wastes and hazardous waste residues, the liner or contaminated soils, he must request a modification to the post-closure permit in accordance with the applicable requirements in LAC 33:V, Chapters 3 and 7. The Permittee must demonstrate that the removal of hazardous wastes will satisfy the criteria of LAC 33:V.3521. By removing hazardous waste, the Permittee may become a generator of hazardous waste and must manage it in accordance with all applicable requirements of LAC 33:V, Subpart 1. If he is granted a permit modification or otherwise granted approval to conduct such removal activities, the Permittee may request that the Administrative Authority approve either:

- V.F.a. the removal of the notation on the deed to the facility property or other instrument normally examined during title search; or
- V.F.b. the addition of a notation to the deed or instrument indicating the removal of the hazardous waste.

V.G. CERTIFICATION OF COMPLETION OF POST-CLOSURE CARE

No later than sixty (60) days after completion of the established post-closure care period for the EDC basin and associated ditches, the Permittee must submit to the Administrative Authority, by registered mail, a certification that the post-closure care period for the hazardous waste disposal unit was performed in accordance with the specifications in the approved post-closure plan. The certification must be signed by the Permittee and an independent registered professional engineer. Documentation supporting the independent registered professional engineer's certification must be furnished to the Administrative Authority upon request until the Administrative Authority releases the Permittee from the financial assurance requirements for post-closure care under LAC 33:V.3711.I.

V.E. POST-CLOSURE CONTACT

The Permittee must provide the name, address, and phone number of the person or office to contact about the EDC Basin and Associated Ditches during the post-closure care period.

V.F. POST-CLOSURE NOTICES

If the Permittee or any subsequent Permittee of the land upon which this hazardous waste disposal unit is located wishes to remove hazardous wastes and hazardous waste residues, the liner or contaminated soils, he must request a modification to the post-closure permit in accordance with the applicable requirements in LAC 33:V, Chapters 3 and 7. The Permittee must demonstrate that the removal of hazardous wastes will satisfy the criteria of LAC 33:V.3521. By removing hazardous waste, the Permittee may become a generator of hazardous waste and must manage it in accordance with all applicable requirements of LAC 33:V, Subpart 1. If he is granted a permit modification or otherwise granted approval to conduct such removal activities, the Permittee may request that the Administrative Authority approve either:

- V.F.a. the removal of the notation on the deed to the facility property or other instrument normally examined during title search; or
- V.F.b. the addition of a notation to the deed or instrument indicating the removal of the hazardous waste.

V.G. CERTIFICATION OF COMPLETION OF POST-CLOSURE CARE

No later than sixty (60) days after completion of the established post-closure care period for the EDC basin and associated ditches, the Permittee must submit to the Administrative Authority, by registered mail, a certification that the post-closure care period for the hazardous waste disposal unit was performed in accordance with the specifications in the approved post-closure plan. The certification must be signed by the Permittee and an independent registered professional engineer. Documentation supporting the independent registered professional engineer's certification must be furnished to the Administrative Authority upon request until the Administrative Authority releases the Permittee from the financial assurance requirements for post-closure care under LAC 33:V.3711.I.

## VI. GROUNDWATER PROTECTION

### VI.A. APPLICABILITY

The regulations of LAC 33:V, Chapters 3, 5, 15, 27, 29, 33, and 35, and Louisiana Water Control Law, R.S., 30:2203 of the Environmental Quality Act, R.S., 30:2001 et seq., and the provisions of this section shall apply to groundwater protection programs at the EDC Basin and Associated Ditches, property of Georgia-Pacific Corporation, located at the Georgia Gulf facility, Plaquemine site, in Iberville Parish. All requirements and conditions of this section must be satisfied and shall apply until the Administrative Authority has accepted the certification of completion of post-closure care required by regulation and under Condition V.G. of this permit. This includes compliance, closure, and post-closure care periods. The units subject to post-closure groundwater monitoring are the EDC Basin and Associated Ditches (West ditch, G Street ditch, H Street ditch and Unnamed ditch).

### VI.B. REQUIRED PROGRAMS

The Permittee must continue to conduct compliance monitoring from the existing systems using all systems necessary to comply with monitoring programs specified herein. All monitor wells associated with the hazardous waste program must be sampled quarterly and water level must be measured for all monitor wells and any piezometers, unless exempted from the program at a later date by the Administrative Authority.

The wells designated as Point of Compliance wells define the extent of the plumes as it was known at the time of issuance of this permit. Any additional wells that are required due to alteration in the plumes' positions will be described as Plume Defining wells. Plume Defining wells will be sampled quarterly for constituents specified in Table 1 to satisfy LAC 33:V.3315.A.3. Table 1 must be updated to include any newly identified constituents detected in Point of Compliance wells during annual sampling for groundwater monitoring constituents in LAC 33:V.3325.Table 4, as required by LAC 33:V.3319.G. If Point of Compliance wells or Plume Defining wells are found to contain constituents above the Maximum Concentration Limits (MCLs) specified in Table 1, then the Permittee must submit a plan to perform an additional assessment to fully identify the extent of the plume.

All wells and any associated piezometers, as located on Figure 1 and described in Table 2, must be maintained, protected from moving equipment, and cannot be abandoned unless exempted from the program at a later date by the Administrative Authority, or unless the integrity of the well or piezometer is threatened. In such case it must be replaced with a new well, in conformance with a work plan approved by the Administrative Authority. The construction



of groundwater monitoring wells must conform to the standards and guidelines specified in "CONSTRUCTION OF GEOTECHNICAL BOREHOLES AND GROUNDWATER MONITORING SYSTEMS HANDBOOK", dated May 1993 ("Construction Handbook", May 1993). This document is printed by and available from the Louisiana Department of Transportation and Development, Water Resources Section, P. O. Box 94245, Baton Rouge, Louisiana 70804-9245. Any required new wells should be installed within thirty (30) days of approval of the work plan by the Administrative Authority. Upon completion of new or replacement wells, a copy of DOTD-GW-1 S, Louisiana Department of Transportation and Development Well Registration Short Form, is to be provided to the Administrative Authority. The entire groundwater monitoring system must be approved by the Administrative Authority. The Permittee must include in the Annual Report revised facility maps, which will show all its monitoring, assessment, compliance, and corrective action wells.

#### VI.C. GROUNDWATER PROTECTION STANDARD

VI.C.1. The Permittee must comply with conditions specified in this permit that are designed to insure that hazardous waste and hazardous waste constituents do not exceed the concentration limits (see Condition VI.D) in the uppermost permeable zones underlying the waste management areas, beyond or below the points of compliance (see Condition VI.E) during the compliance period (see Condition VI.F). The protection standard does not exempt the Permittee from required corrective actions regarding contamination detected by wells not assigned as groundwater compliance points.

VI.C.2. The Permittee must utilize and maintain the present groundwater monitoring system described by Table of this permit. Monitoring wells for the facilities are as follows:

##### Up-gradient Background Monitoring Wells

- "Stratum III": Well 10A
- "Stratum IV": Well 10B
- "Stratum V": Well 10C

##### Down-gradient Point of Compliance Wells

- "Stratum III": Wells EDC-17, LR-1, 8A, EDC-1R
- "Stratum IV": Wells EDC-7 and EDC-16B
- "Stratum V": Wells EDC-16C and EDC-13C

### Monitoring Wells

- "Stratum III": Wells EDC-5, LR-2, EDC-15, EDC-13A, 9A, LR-3 and EDC-16A
- "Stratum IV": Well EDC-9R
- "Stratum V": Wells 8B, and EDC-14
- Well 9 A is included as a monitor well but will be mainly used to evaluate the evolution/natural attenuation of the EDC and vinylchloride.
- "Plaquemine Aquifer": The closest water supply well in the plant placed into the Plaquemine Aquifer will be analyzed quarterly for constituents of concern.

### Plume Defining Wells

- "Stratum III": EDC-19A

Installation of Assessment Wells, Recovery Wells, Plume Defining Wells, and/or additional systems may be required as a condition of the Corrective Action Program pursuant to LAC 33:V.3303, 3319, and 3321, and Condition VI.J of this permit.

All monitoring wells must be maintained so that surface infiltration is prohibited and groundwater samples are generated with a water quality of five (5) or less nephelometric turbidity units (N.T.U). If turbidity levels in groundwater samples are outside naturally occurring variabilities or outside the historically recorded levels for, any monitoring well, and if a water clarity of five (5) units is not achievable, then the Permittee may be required to demonstrate to the satisfaction of the Administrative Authority the cause of the change in turbidity and that turbidity of the water samples will not compromise the validity of the analyses.

VI.C.3. The Permittee must also measure pH as a standard indicator of groundwater contamination, along with specific conductance which will be used to indicate well integrity and possible groundwater contamination. The results of these analysis must be recorded in the field log book and interpreted.

VI.C.4. The Permittee must adhere to the Sampling and Analysis Plan outlined below:

VI.C.4.a. All wells illustrated on Figure 1 and any additional wells required by this permit must be sampled quarterly, and the samples managed and tested as required under

Condition VI.C.4.e. The analytical results must be submitted in the Quarterly Monitoring Reports in accordance with Condition III.M.3 and maintained on site by the Permittee. However, if subsequent statistically significant evidence of contamination to groundwater is discovered (as per LAC 33:V.3315) then reporting must be in accordance with Conditions VI.I and J of this permit as applicable.

VI.C.4.b. Wells without in-well dedicated pumps must be measured for depth to water and total depth each time the wells are sampled on the same day and prior to purging. Wells with dedicated in-well pumps must be measured for depth to water on the same day and prior to purging. Wells with dedicated in-well pumps must be measured for total depth biennially (every other year). Should any of the total depth measurements indicate (through change in total depth from the original completion depth) siltation of the well greater than 10% of the total screen length, the Permittee must take all steps necessary to re-establish the original drilled depth of the well. Failing this, the Permittee must notify the Administrative Authority and request authorization to plug and abandon the well in accordance with LAC 33.V.3323. Prior to purging, each well must be checked to determine if any constituents with a density less than water (floaters/LNAPL's) or greater than water sinkers/DNAPL's) are present. This determination is to be made by obtaining a sample from the top of the water column (to check for LNAPL's) then obtaining a sample from the bottom of the water column (to check for DNAPL's), and checking for a sheen or any indication of a separate phase of contaminants. If contaminants are apparent in this sample, the thickness of the floating or sinking contaminants within the well must be measured and recorded. A sample of the contaminants must be collected and analyzed separately for the constituents listed in Table 1 of this permit.

VI.C.4.c. Each well must be purged by evacuation to dryness or by removing a minimum of three (3) casing volumes. The well must be sampled immediately upon purging and/or when sufficient water for sampling has recharged the well. Low yielding wells (wells purged to dryness) must be allowed to recover for twenty-four (24) hours

before sampling in order to obtain a more representative sample. Purging and sampling methods must be compatible throughout the post-closure care period until the Administrative Authority has accepted the certification of completion of post-closure care required by regulation and under Condition V.G. of this permit.

VI.C.4.d. Samples must be withdrawn using dedicated or adequately cleaned equipment for each well. No equipment or method may be used that will chemically alter or influence the sample. Care must be taken to avoid placing clean sampling equipment on the ground or on any contaminated surface. Sampling methods and equipment must be compatible throughout the post-closure care period until the Administrative Authority has accepted the certification of completion of post-closure care required by regulation and under Condition V.G. of this permit.

VI.C.4.e. Sample preservation, handling and containerization must meet the specifications of LAC 33:V and Test Methods for Evaluating Solid Waste Physical/Chemical Methods, 3<sup>rd</sup> Ed. (EPA Publication Number SW-846, 1986, as amended) or an equivalent substitute as approved by the Administrative Authority. Parameters, containers, preservation methods, and analytical limits are listed in Table 1, Condition VI.D, herein.

VI.C.4.f. Analytical methods equivalent to SW-846 (or analyses for parameters not listed in SW-846) must be approved by the Administrative Authority prior to implementation.

VI.C.4.g. A chain-of-custody protocol must be employed that will allow for the tracing of possession and handling of samples from the time of collection through laboratory analysis. All sample containers must be labeled to indicate date and time of sampling and to prevent mis-identification, have proper seals, and indicate the test parameters required.

VI.C.4.h. An up-to-date field log book must be kept at the site which documents for each sample the well identification number, total well depth, water level, water color (visual), well evacuation procedures and

equipment, sample withdrawal procedures and equipment, date, time, sample identification numbers, field measurements (pH, specific conductance, etc.) and methods, name of collector, field observations, calculations of the standing water volume in the well, and the total volume evacuated.

VI.D. HAZARDOUS CONSTITUENTS, PARAMETERS, ANALYTICAL FREQUENCY AND CONCENTRATION LIMITS

The wells, hazardous constituents, and concentration limits to which the protection standards of LAC 33:V.3305 apply are shown herein appended. The sampling frequency for constituents is noted in Table 2.

The Permittee must continue existing corrective actions or institute corrective actions in all areas associated with the EDC basin and associated ditches where groundwater has been affected by hazardous wastes, hazardous constituents, or parameters exceeding the assigned concentration limits, and implement corrective measures in other areas which may be discovered to exceed these limits in the future.

The Permittee must also notify the Administrative Authority in accordance with the schedule specified in Conditions VI.I and VI.J, as applicable, when any of the above parameters are detected in concentrations equal to or exceeding the designated limits at the points of compliance or upon first detection in any other monitoring well at the plant site.

VI.E. POINT OF COMPLIANCE

The point of compliance at which the groundwater protection standard of LAC 33:V.3305.A applies, and at which quarterly monitoring must be conducted, are the vertical intervals intercepted by the wells identified in Table 2 and required by Condition VI.C.2.

When contamination is detected in the uppermost permeable zone underlying the waste management area, the next vertical aquifer or permeable zone must also be monitored during compliance and corrective action periods. The horizontal limit of compliance must be the surface following an imaginary line connecting the risers of monitoring wells EDC-17, LR-1, 8A, and EDC-IR for Stratum III wells, wells EDC-7 and EDC-16B for Stratum IV and wells EDC-13, and MW-16C for Stratum V, unless amended through permit modifications by the Administrative Authority in the future. The vertical limit of compliance must be the "Stratum V". Groundwater quality at each monitoring well identified above must be determined quarterly, unless subsequent contamination is detected as per LAC 33:V.3303, then monitoring

must be conducted in accordance with the schedules specified in Conditions VI.H, I, and J, as applicable.

#### VI.F. COMPLIANCE PERIOD

The compliance period during which the groundwater protection standard of LAC 33:V.3305.A applies is until the Administrative Authority has accepted the certification of completion of post-closure care required by regulation and under Condition V.G. of this permit. This period ends after a corrective action program has been implemented, and the Permittee has demonstrated that the corrective action has been effectively implemented and the groundwater protection standard of LAC 33:V.3305.A has not been exceeded for a period of three (3) consecutive years.

The Permittee must determine groundwater quality in the uppermost permeable zone throughout the active life of the facility plus thirty (30) years for any post-closure care monitoring, or as required by the Administrative Authority through permit modifications.

#### VI.G. GENERAL REQUIREMENTS

- VI.G.1. The Permittee's groundwater monitoring system for the previously identified hazardous waste management facilities must consist of all wells designated on Figure 1 and as required by Condition VI.C.2 above, unless exempted in the future by the Administrative Authority through permit modification.
- VI.G.2. Up-gradient wells must always yield groundwater samples from the uppermost water bearing zone that are representative of groundwater that has not been affected by possible leakage from the waste management units. Downgradient compliance wells and vertical compliance wells must yield groundwater samples from the water bearing zones that represent the quality of groundwater beneath the facilities that flows to the points of compliance.
- VI.G.3. The Permittee must maintain the structural and mechanical integrity of all wells and provide protection from accidental damage and surface infiltration, as well as implement a monitoring well inspection schedule. A written report on damage to any well must be submitted to the Administrative Authority in a timely manner.

- VI.G.4. The Permittee must conform to the sampling and analysis requirements listed in Conditions VI.C, E, I, and J, herein, and as required by LAC 33:V.3315.A groundwater surface potentiometric map must be prepared for each sampling event and submitted on an annual basis for each separate zone that is monitored.
- VI.G.5. The Permittee must use one of the statistical procedures outlined in LAC 33:V.3315.H or as submitted by the Permittee as required by Condition II.E.21 of this permit (Schedule of Compliance) and approved by the Administrative Authority in determining whether background values or concentrations have been exceeded for the RCRA parameters, pH, and specific conductance. The Permittee shall be allowed to propose an equivalent statistical method, by submitting supporting documentation, which must be approved by the Administrative Authority prior to implementation. For wells confirmed to contain constituents in Table 1 of this permit, the Permittee must use the approved statistical procedures to determine if concentrations are increasing, in accordance with LAC 33:V.3319.D. Determination of the statistical analysis must be performed within sixty (60) days after sampling.
- VI.G.6. The Permittee must also graphically represent the values of pH, conductance and RCRA parameters for each sampling episode. The graphic interpretations of data in the form of isopleth maps and concentration versus time graphs, must be submitted with the analytical results in the annual report and should be utilized in concert with all statistical evaluations pertaining to facility impact on groundwater.
- VI.G.7. Records of all sampling and analytical work must be maintained at the plant site during the life of the facilities, including post-closure care periods.
- VI.G..8. An annual groundwater report must be submitted each year no later than March 1, as required by LAC 33:V.1529.D.8. This report must summarize all groundwater activities for the preceding calendar year including an evaluation of the monitoring strategy in relation to the direction of groundwater flow and locations of wells associated with the facilities. Applicable calculations must also include groundwater flow contaminant migration rates (as applicable), statistical comparisons, and any other information as it regards corrective actions required by this permit.

## VI.H. DETECTION MONITORING PROGRAM

Downgradient wells that are presently contaminated, but eventually produce clean water for at least three (3) years because of on-going corrective action, the wells must be re-scheduled for detection monitoring on a semi-annual basis. The Permittee must request modification of this permit to include a detection monitoring program if the above condition is satisfactorily demonstrated to the Administrative Authority. A reevaluation of the statistical methods and concentration limits shall be required as part of the application process.

## VI.I. COMPLIANCE MONITORING

The Permittee must conduct a compliance monitoring program in accordance with LAC 33:V.3319.

VI.I.1. The Permittee must determine the concentration of each hazardous constituent listed in Table 1 of Condition VI.D at least quarterly during compliance monitoring periods (from groundwater in the wells listed in Figure 1 and required by Condition VI.C.2). At least annually the Permittee must analyze samples from all monitoring wells at the compliance point for all constituents listed in LAC 33:V.3325, Table 4, to determine whether additional hazardous constituents are present in the uppermost aquifer (and, if so, at what concentration), pursuant to procedures of this permit. If the Permittee finds LAC 33:V.3325, Table 4 constituents in the groundwater that are not already identified in the permit as monitoring constituents, the Permittee may re-sample within one month and repeat LAC 33:V.3325, Table 4 analysis. If the second analysis confirms the presence of new constituents, the Permittee must report the concentrations of these additional constituents to the Administrative Authority within seven days after the completion of the second analysis and add them to the monitoring list. If the Permittee chooses not to re-sample, then he or she must report the concentrations of these additional constituents to the Administrative Authority within seven days after completion of the initial analysis and add them to the monitoring list.

VI.I.2. If the Permittee determines, pursuant to LAC 33:V. 3319.D., 3321.C, and Condition VI.B that any concentration limits under LAC 33:V.3309 are being exceeded at any monitoring well at the point of compliance, he or she must:

VI.I.2.a. notify the Administrative Authority of this finding in writing within seven (7) days. The notification must



indicate which concentration limits have been exceeded and list the contaminants and concentrations; and

VI.I.2.b. submit, to the Administrative Authority, an application for a permit modification to establish or modify corrective action programs meeting the requirements of LAC 33:V.3321 within 180 days, or within ninety (90) days if a certified engineering feasibility study has been previously submitted to the Administrative Authority under LAC 33:V.3317.G.5.b. The application must include the following information:

VI.I.2.b.i. a detailed description and schedule for assessment and corrective actions that will achieve compliance with the groundwater protection standard specified in Condition VI.D of this permit under LAC 33:V.3319.A; and

VI.I.2.b.ii. a geotechnical plan (certified by a qualified geologist or a geotechnical engineer) to demonstrate the effectiveness of the planned corrective actions. This plan may incorporate the compliance monitoring program developed to meet the requirements of this permit, except that the Permittee will be required to monitor as frequently as necessary (as required in Condition VI.J.1) to assure that sufficient data will be generated for demonstrating the effectiveness of the corrective actions; and

VI.I.2.b.iii. a plan to initiate compliance monitoring as stipulated in Condition VLE in accordance with LAC 33:V.3311. The Permittee must evaluate all compliance monitoring wells identified in Figure 1 and required by Condition VI.C.2, herein, for the presence of all constituents listed in Table 4, LAC 33:V, Chapter 33, as amended for which there are reliable means of compound identification and quantitation. Compound identification shall require the use of an authentic standard. The sampling and analyses for the constituents appearing in LAC 33:V, Chapter 33, Table 4 must be done annually, and the results included in the annual report.

This testing and reporting requirement is to be followed until terminated by the Administrative Authority after the Permittee has satisfactorily defined the water quality in the zone(s) of interest.

VI.I.2.c. If the Permittee determines, pursuant to LAC 33:V.3319.D, that the groundwater concentration limits under this Section are being exceeded at any monitoring well at the point of compliance, he or she may demonstrate that a source other than a regulated unit caused the contamination, or that the detection is an artifact caused by an error in sampling, analysis, or statistical evaluation, or natural variation in the groundwater. In making a demonstration under this Condition, the Permittee, must:

VI.I.2.c.i. notify the Administrative Authority in writing within seven days that he or she intends to make a demonstration under this condition;

VI.I.2.c.ii. within ninety (90) days, submit a report to the Administrative Authority which demonstrates that a source other than a regulated unit caused the standard to be exceeded or that the apparent noncompliance with the standards resulted from an error in sampling, analysis or evaluation;

VI.I.2.c.iii. within ninety (90) days, submit to the Administrative Authority an application for a permit modification to make any appropriate changes to the compliance monitoring program at the facility; and

VI.I.2.c.iv. continue to monitor in accord with the compliance monitoring program established under this permit. In accordance with LAC 33:V.3303.D, compliance with corrective action programs required in LAC 33:V.3303, 3319, and 3321 will constitute compliance with Condition VI.I.2 for previously reported detections and/or exceedances. In this case, the Permittee must implement a groundwater monitoring program to demonstrate the effectiveness of the corrective action program.

Such a monitoring program may be based on the requirements for a compliance monitoring program under LAC 33:V.3319 and must be as effective as that program in determining compliance with the groundwater protection standard under LAC 33:V.3305 and in determining the success of a corrective action program under LAC 33:V.3321.E, where appropriate.

- VI.I.2.d. If the Permittee determines that the compliance monitoring program no longer satisfies the requirements of this permit, he or she must, within ninety (90) days submit an application for a permit modification to make any appropriate changes to the program.

#### VI.J. CORRECTIVE ACTION PROGRAM

VI.J.1. If subsequent groundwater contamination is confirmed as a result of operations related to past or present hazardous waste management facilities identified in Condition VI.A of this permit, the Permittee must establish, expand, or continue any corrective action programs in accordance with the requirements of LAC 33:V.3321 and as subsequently directed by the Administrative Authority. Water quality sampling, water level measurements and the general compilation of data to demonstrate the effectiveness of existing and new corrective action programs must be made on a quarterly basis until compliance with groundwater protection standards is achieved for at least three (3) years or until this requirement is terminated in writing by the Administrative Authority (after the data indicates adequate control of contaminant migration and concentration increases). The effectiveness of the corrective actions by the Permittee must be reported semi-annually to the Administrative Authority as stipulated in LAC 33:V.3321.G., and must include the following:

- VI.J.1.a. a facility map showing all up-gradient, assessment, plume defining, point of compliance monitoring wells and recovery wells and identifying zones in which wells are screened;
- VI.J.1.b. a table showing well number, well depth, screened interval, zone monitored, well diameter and screen and casing material for all up-gradient, assessment, plume defining, point of compliance monitoring wells, and

recovery wells and the type of pump used if the well is a recovery well;

- VI.J.1.c. a summary of analytical data for all up-gradient, assessment, plume defining, point of compliance monitoring wells, and recovery wells for the reporting period;
  - VI.J.1.d. a discussion of any significant changes in the analytical data from all up-gradient, assessment, plume defining, point of compliance monitoring wells, and recovery wells for the reporting period;
  - VI.J.1.e. contaminant concentration isopleths for each monitored one and each contaminant;
  - VI.J.1.f. water level measurements and potentiometric surface maps for each monitored zone for the reporting period;
  - VI.J.1.g. total volume of liquids removed and the volume of contaminants removed for each components of the system (i.e. recovery wells, French drain systems, etc.) and cumulative amount for the entire system for the reporting period and total volume to date;
  - VI.J.1.h. a discussion of the down time for any well or part of the system for the reporting period and actions taken by the facility to return the system to normal operations and maximum efficiency;
  - VI.J.1.i. concentration versus time graphs for all wells used to determine the effectiveness of the contaminant recovery program;
  - VI.J.1.j. a discussion of the effectiveness and progress of remedial activities.
- VI.J.2. Adequate management of the plume of contamination to prevent or arrest off-site migration from any area of the plant site must be achieved within five (5) years of the effective date of this permit and implemented in accordance with LAC 3.V.3322.
- VI.J.3. Additionally, and in accordance with the authority of the Louisiana Water Control Law R.S. 30:2071 of the Environmental Quality Act, R.S., 30:2001 et seq., and as allowed by LAC 33:V.309

pertaining to special conditions of the groundwater section of the permit, the Permittee must notify the Administrative Authority upon discovery of any additional discharge into the groundwaters of the State at the Permittee's plant site of any waste or any other substance of any kind that will tend to cause water pollution in violation of any rule, order, or regulation or in violation of any term, condition, or limit imposed by a permit. As a result of such discharges to groundwaters the Permittee must:

- VI.J.3.a. notify the Administrative Authority of the nature and circumstances of the discharge within seven (7) days of discovery;
- VI.J.3.b. submit adequate plans and schedules, certified by a qualified geologist or geotechnical engineer, to evaluate the extent of the discharge and need for corrective actions within ninety (90) days from the notification in Condition VI.J.2.a above; and
- VI.J.3.c. submit a schedule and plans for corrective actions as directed by the Administrative Authority, within sixty (60) days from completion of the groundwater evaluation in Condition VI.J.2.b above.

VI.K. ABANDONMENT OF MONITORING WELLS AND GEOTECHNICAL BOREHOLES

The Permittee must provide for the sealing of any vertical migration path resulting from exploratory boring, leachate collection or detection systems and/or groundwater monitoring programs as provided in LAC 33:V.3323, and follow abandonment procedures conforming to the standards and guidelines specified in **"Construction of Geotechnical Boreholes and Groundwater Monitoring Systems"** prepared by the Louisiana Department of Environmental Quality and the Louisiana Department of Transportation and Development, dated May 1993. A work plan for the plugging and abandonment of a well must be submitted for approval by the Administrative Authority, whenever such migration pathways are discovered. Upon completion of well abandonment, a copy of DOTD-GW-2, Louisiana Department of Transportation and Development Well Plugging and Abandonment Form, must be submitted to the Administrative Authority.

**TABLE 1**  
**MONITORING PARAMETERS, ANALYTICAL METHODS, AND MAXIMUM**  
**CONCENTRATION LIMITS FOR GROUNDWATER PROTECTION STANDARDS**

PARAMETER	CONTAINER TYPE	PRESERVATION METHOD	ANALYTICAL METHOD <sup>1</sup>	MCL <sup>2</sup> (mg/l)	PQL <sup>3</sup> (mg/l)
Benzene	3 x 40-ml glass vials	HCl to pH<2 Cool 4° C	8260	0.005	0.005
Chloroform	3 x 40-ml glass vials	HCl to pH<2 Cool 4° C	8260	-	0.005
Ethylbenzene	3 x 40-ml glass vials	HCl to pH<2 Cool 4° C	8260	0.7	0.005
Dichloromethane	3 x 40-ml glass vials	HCl to pH<2 Cool 4° C	8260	0.005	0.005
1,1-Dichloroethane	3 x 40-ml glass vials	HCl to pH<2 Cool 4° C	8260	-	0.005
1,2-Dichloroethane (EDC)	3 x 40-ml glass vials	HCl to pH<2 Cool 4° C	8260	0.005	0.005
1,1-Dichloroethene	3 x 40-ml glass vials	HCl to pH<2 Cool 4° C	8260	0.007	0.005
cis-1,2-dichloroethene	3 x 40-ml glass vials	HCl to pH<2 Cool 4° C	8260	.07	.005
trans-1,2-dichloroethene	3 x 40-ml glass vials	HCl to pH<2 Cool 4° C	8260	0.1	.005
1,1,2-Trichloroethane	3 x 40-ml glass vials	HCl to pH<2 Cool 4° C	8260	0.005	0.005
Vinyl chloride	3 x 40-ml glass vials	HCl to pH<2 Cool 4° C	8260	0.002	0.002
Trichloroethylene	3 x 40-ml glass vials	HCl to pH<2 Cool 4° C	8260	0.005	0.005
Benzoic acid	1-gal jug or 1-liter bottle, amber glass w/Teflon liner in cap	Cool 4° C	8270	-	0.05
Bis(2-chloro-ethyl)ether	1-gal jug or 1-liter bottle, amber glass w/Teflon liner in cap	Cool 4° C	8270	-	0.01
Phenol	1-gal jug or 1-liter bottle, amber glass w/Teflon liner in cap	Cool 4° C	8270	-	0.01
Arsenic, Dissolved	250 mL plastic bottle	HNO <sub>3</sub> to pH <2	6010/6020	0.05	0.01
Barium, Dissolved	250-mL plastic bottle	HNO <sub>3</sub> to pH <2	6010/6020	2	0.2
Water Level	N/A	N/A	N/A	N/A	N/A
Specific Conductance @25°C	Glass or Polyethylene	Field Measurement	Field Measurement	N/A	N/A
pH	Glass or Polyethylene	Field Measurement	Field Measurement	N/A	N/A

<sup>1</sup> Analytical Method as published in USEPA SW-846 Test Methods for Evaluating Solid Waste – most current approved edition. Suffixes are not included for the analytical methodologies. The most current approved methods will be used for analyses

<sup>2</sup> MCL - Maximum Contaminant Limit - based upon current National Primary Drinking Water Standards.

<sup>3</sup> PQL - Practical Quantitation Limit - the lowest analyte concentration in a given matrix that can be reliably determined within specified limits of precision and accuracy by the indicated methods under routine laboratory operating conditions.

**TABLE 2****RCRA COMPLIANCE MONITORING WELLS AND SAMPLING FREQUENCIES**

<b>WELL</b>	<b>TYPE</b>	<b>STATUS</b>	<b>SAMPLING FREQUENCY</b>
<b>STRATUM III</b>			
8A	POC <sup>1</sup>	Existing	Table 1-Quarterly <sup>4</sup> Table 4-Annually <sup>5</sup>
9A	MW <sup>2</sup>	Existing	Table 1-Quarterly
10A	UG MW	Existing	Table 1-Quarterly
EDC-1R	POC	Existing	Table 1-Quarterly Table 4-Annually
EDC-5	MW	Existing	Table 1-Quarterly
EDC-13A	MW	Existing	Table 1-Quarterly
EDC-15	MW	Existing	Table 1-Quarterly
EDC-16A	MW	Existing	Table 1-Quarterly
EDC-17	POC	Existing	Table 1-Quarterly Table 4-Annually
LR-1	POC	Existing	Table 1-Quarterly Table 4-Annually
LR-2	MW	Existing	Table 1-Quarterly
LR-3	MW	Existing	Table 1-Quarterly
EDC-19A	PD <sup>3</sup>	Proposed	Table 1-Quarterly

**STRATUM IVB**

10B	UG MW	Existing	Table 1-Quarterly
EDC-7	POC	Existing	Table 1-Quarterly Table 4-Annually
EDC-9R	MW	Existing	Table 1-Quarterly
EDC-16B	POC	Existing	Table 1-Quarterly Table 4-Annually

**STRATUM V**

8B	MW	Existing	Table 1-Quarterly
10C	UG MW	Existing	Table 1-Quarterly
EDC-13C	POC	Existing	Table 1-Quarterly Table 4-Annually
EDC-14	MW	Existing	Table 1-Quarterly
EDC-16C	POC	Existing	Table 1-Quarterly Table 4-Annually



**TABLE 2 (CONTINUED)**

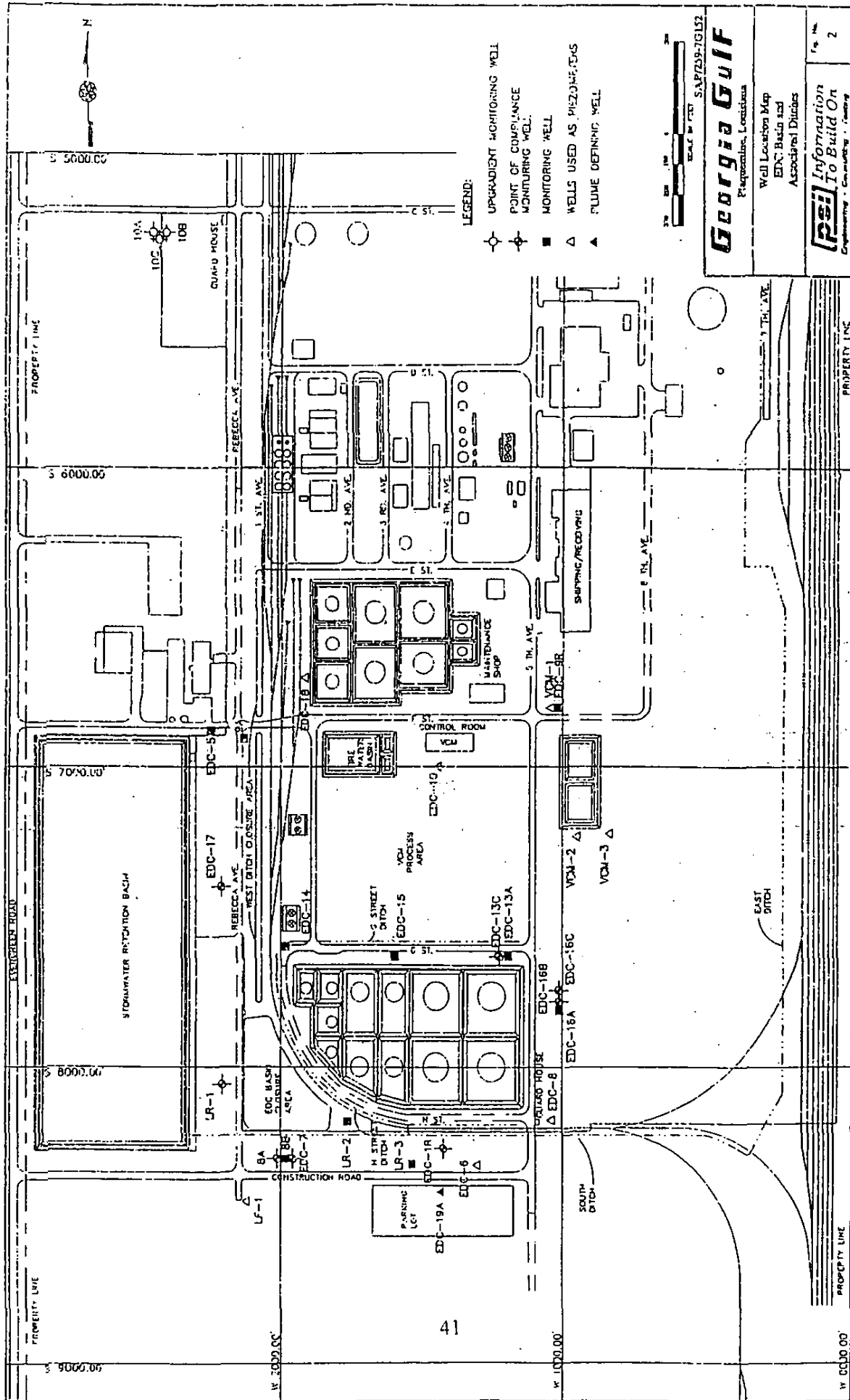
<sup>1</sup> POC -- Point of Compliance Well

<sup>2</sup> Monitor Well

<sup>3</sup> Plume Defining Well

<sup>4</sup> These wells shall be sampled quarterly for constituents listed in Table 1 of this permit

<sup>5</sup> These wells shall be sampled annually for constituents listed in LAC 33:V.3325, Table 4

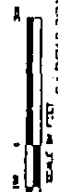


**Georgia Gulf**  
Petrochemicals, Louisiana

Well Location Map  
EDC Basin and  
Associated Ditches

**psi** Information  
To Build On  
Engineering - Consulting - Training

Page No. 2



SAP/259-70132

**LEGEND:**

- UPGRADIENT MONITORING WELL
- POINT OF COMPLIANCE MONITORING WELL
- MONITORING WELL
- WELLS USED AS PIEZOMETERS
- FLUME DEFINING WELL

**HAZARDOUS  
AND  
SOLID  
WASTE  
AMENDMENTS**

SECTION VII. SPECIAL CONDITIONS PURSUANT TO THE 1984 HAZARDOUS AND SOLID WASTE AMENDMENTS (HWA) TO RCRA FOR GEORGIA-PACIFIC CORPORATION, EPA I.D. NUMBER LAR000003483.

TABLE OF CONTENTS

VII.A.	DEFINITIONS .....	43
VII.B.	STANDARD CONDITIONS .....	44
VII.B.1.	Waste Minimization [RESERVED] .....	44
VII.B.2.	Dust Suppression .....	43
VII.B.3.	Permit Modification .....	45
VII.B.4.	Permit Review .....	47
VII.B.5.	Compliance with Permit .....	47
VII.B.6.	Specific Waste Ban [RESERVED] .....	47
VII.B.7.	Information Submittal .....	47
VII.B.8.	Plans and Schedules Incorporation Into Permit .....	48
VII.B.9.	Data Retention .....	48
VII.B.10.	Management of Wastes .....	48
VII.C.	BIF RULE [RESERVED] .....	49
VII.D.	AA-BB AIR REGULATIONS [RESERVED] .....	49
VII.E.	CORRECTIVE ACTION .....	49
VII.E.1	Corrective Action for Release .....	49
VII.E.2.	Action Levels .....	49
VII.E.3.	Risk Assessment .....	50
VII.E.4.	Corrective Action for Releases Beyond Facility Boundary .....	51
VII.E.5.	Financial Responsibility .....	52
VII.E.6.	Dispute Resolution .....	52
VII.F.	REPORTING REQUIREMENTS .....	53
VII.G.	NOTIFICATION REQUIREMENTS FOR AND ASESSEMENT OF NEWLY-IDENTIFIED SWMU's AND POTENTIAL AOC's .....	54
VII.H.	NOTIFICATION REQUIREMENTS FOR NEWLY-DISCOVERED RELEASES AT SWMU(s) AND AOC(s) .....	55
VII.I.	INTERIM MEASURES .....	55
VII.J.	RFI WORKPLAN [RESERVED] .....	56

## VII.A. DEFINITIONS

For the purposes of these special conditions pursuant to the 1984 Hazardous and Solid Waste Amendments to RCRA, the following definitions shall apply:

**"Action Level"** means health and environmental-based level of constituent concentrations determined by the administrative authority to be indicators for protection of human health and the environment.

**"Administrative Authority"** means the Louisiana Department of Environmental Quality, or his/her designee, or, in the case of HSWA provisions for which the State is not authorized, the United States Environmental Protection Agency (EPA.)

**"Area of Concern" (AOC)** means any discernable unit or area which, in the opinion of the administrative authority, may have received solid or hazardous waste or waste containing hazardous constituents at any time. The administrative authority may require investigation of the unit to determine if it is a SWMU. If shown to be a SWMU by the investigation, the AOC must be reported by the Permittee as a newly-identified SWMU. If the AOC is shown not to be a SWMU by the investigation, the administrative authority may determine that no further action is necessary and notify the Permittee in writing.

**"CMS"** means Corrective Measures Study.

**"EPA"** means the United States Environmental Protection Agency.

**"Facility"** means all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA.

**"HSWA"** means the 1984 Hazardous and Solid Waste Amendments to RCRA.

**"Hazardous constituent"** means any constituent identified in Appendix VII of 40 CFR Part 261, or any constituent identified in Appendix IX of 40 CFR Part 264.

**"Hazardous waste"** means a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

**"LDEQ"** means the Louisiana Department of Environmental Quality.

**"Permit"** means the conditions embodied in these special conditions pursuant to the 1984 Hazardous and Solid Waste Amendments to RCRA.

**"Permittee"** means Georgia-Pacific Corporation, Plaquemine, LA..

**"RCRA"** means the Resource Conservation and Recovery Act of 1976 has amended by HSWA in 1984.

**"RCRA Permit"** means the full permit, with RCRA and HSWA portions.

**"RFA"** means RCRA Facility Assessment.

**"RFI"** means RCRA Facility Investigation.

**"Release"** means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents.) RCRA section 3004 (u) corrective action authority does not routinely reevaluate permitted releases.

**"Solid Waste Management"** means the systematic administration of activities which provide for the collection, source separation, storage, transportation, transfer, processing, treatment, and disposal of solid waste.

**"Solid Waste Management Unit" (SWMU)** means any discernible unit at which solid wastes have been placed at any time irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released. The definition includes regulated units (i.e., landfills, surface impoundments, waste piles and land treatment units) but does not include passable leakage or one-time spills from production areas and units in which wastes have not been managed (e.g., product storage areas.)

If, subsequent to the issuance of this permit, regulations are promulgated which redefine any of the above terms, the administrative authority may, at its accordance with 40 CFR Section 270.41.

## VII.B. STANDARD CONDITION

### VII.B.1. Waste Minimization [RESERVED]

### VII.B.2. Dust Suppression

Pursuant to 40 CFR 266.23(b), and the Toxic Substances Control Act, the Permittee shall not use waste or used oil or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs,) or any other hazardous waste (other than a waste identified solely on the basis of ignitability,) for dust suppression or road treatment.

### VII.B.3. Permit Modification

#### VII.B.3.a. Agency Initiated Modifications

If at any time for any of the reasons specified in 40 CFR 270.41, the administrative authority determines that modification of this permit is necessary, the agency may initiate permit modification proceedings in accordance with the regulations set forth at 40 CFR 270.41.

#### VII.B.3.b. Permittee Initiated Modification

The Permittee may, where appropriate, initiate permit modifications in accordance with the regulations set forth at 40 CFR 270.42. All applicable requirements and procedures as specified in 40 CFR 270 shall be followed by Permittee in initiating such proceedings.

#### VII.B.3.c. Modification of Corrective Action Schedules of Compliance. (COC)

VII.B.3.c.(1). The Permittee shall adhere to CASC's contained in the permit. If at any time, the Permittee determines that such schedules cannot be met, the Permittee shall, within fifteen (15) days of such determination, notify the administrative authority and submit a request for a permit modification under 40 CFR 270.42, with a justification as to why the current CASC cannot be met.

VII.B.3.c.(2). If the administrative authority determines that a modification of the CASC is required, the following procedure will apply. CASC modifications made under this procedure are not subject to administrative appeal.

VII.B.3.c.(2)(i). The administrative authority will notify the Permittee in writing of the proposed modification. Such notice will:

- (1) describe the exact changes to be made to the permit conditions;
- (2) provide an explanation of why the modification is needed;
- (3) provide notification of the date by which comments on the proposed modification must be received. Such date will not be less than twenty days from the date the notice of the proposed modification is received by the Permittee, or after the public notice is published;

- (4) provide notification that supporting documentation or data may be available for inspection at the State or EPA Regional office; and
- (5) include the name and address of a representative of the administrative authority to whom comments may be sent.

VII.B.3.c.(2)(ii). The Administrative Authority shall:

- (1) publish a notice of the proposed modification in a newspaper distributed in the locality of the facility, which includes notice of items in Permit Condition VII.B.3.c.(2)(i).
- (2) mail a notice of the proposed modification to all persons on the mailing list maintained according to 40 CFR 124.10(c)(1). Such notice will include items under Permit Condition VII.B.3.c.(2)(a), and shall be mailed concurrently with notice to the Permittee.
- (3) for facilities which have established an information repository, the administrative authority shall place a notification of the proposed modification, including items under Permit Condition VII.B.3.c.(2)(a) in the information repository concurrently with actions taken under those items.

VII.B.3.d. Administrative Authority's Decision Regarding Modification

VII.B.3.d.(1). If the administrative authority receives no written comments on the proposed modification, the modification shall become effective five (5) calendar days after the close of the comment period. The administrative authority shall:

- VII.B.3.d.(1)(i). notify the Permittee in writing of the final decision; and
- VII.B.3.d.(1)(ii). notify individuals on the facility mailing list in writing that the modification has become effective and shall place a copy of the modified permit in the information repository, if a repository is required for the facility.



#### VII.B.4. Permit Review

This permit may be reviewed by the administrative authority five years after the date of permit issuance and may be modified as necessary as provided for in Permit Condition VII.B.3. Nothing in this section shall preclude the administrative authority from reviewing and modifying the permit at any time during the term.

#### VII.B.5. Compliance with Permit

Compliance with a RCRA permit during its term constitutes compliance, for the purposes of enforcement, with subtitle C of RCRA except for those requirements not included in the permit which:

- VII.B.5.a. become effective by statute;
- VII.B.5.b. are promulgated under 40 CFR 268 restricting the placement of hazardous wastes in or on the land; or
- VII.B.5.c. are promulgated under 40 CFR 264 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units. The leak detection system requirements include double liners, CQA programs, monitoring action leakage rates, and response action plans, and will be implemented through the procedures of 40 CFR 270.42, Class One permit modification.

#### VII.B.6. Specific Waste Ban [RESERVED]

#### VII.B.7. Information Submittal

Failure to comply with any condition of the permit, including information submittal, constitutes a violation of the permit, and is grounds for enforcement action, permit amendment, termination, revocation, suspension, or denial of permit renewal application. Falsification of any submitted information is grounds for termination of this permit (40 CFR 270.43.)

The Permittee shall ensure that all plans, reports, notifications, and other submissions to the administrative authority required in this permit are signed and certified in accordance with 40 CFR 270.11. A summary of the planned reporting requirements pursuant to this permit is found in Table 1. Two (2) copies of these plans, reports, notifications or other submissions shall be submitted to the administrative authority by certified mail or hand delivered to:

U.S. EPA Region 6  
Multimedia Planning and Permitting Division, 6PD-O  
1445 Ross Avenue  
Dallas, Texas 75202-2733

and

Louisiana Department of Environmental Quality  
Office of Environmental Services  
Permits Division  
Post Office Box 4313  
Baton Rouge, LA 70821-4313

#### VII.B.8. Plans and Schedule Incorporation into Permit

All plans and schedules required by this permit are, upon approval by the administrative authority, incorporated into this permit by reference and become an enforceable part of this permit. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject the Permittee to enforcement action under Section 3008 of RCRA which may include fines, suspension, or revocation of permit.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this permit. Written requests for extensions of due dates for submittals may be granted by the administrative authority in accordance with Permit Condition VII.B.3.

If the administrative authority determines that actions beyond those provided for, or changes to what is stated herein, are warranted; the administrative authority may modify this permit according to procedures in Permit Condition VII.B.3.

#### VII.B.9. Data Retention

All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered during activities undertaken pursuant to this permit shall be maintained at the facility during the term of this permit, including any reissued Permits.

#### VII.B.10. Management of Waste

All solid wastes which are managed pursuant to a remedial measure taken under the corrective action process or as an interim measure addressing a release or the threat of a release from a solid waste management unit shall be managed in a manner protective of human health and the environment and in compliance with all applicable Federal, State, and local requirements. Until such time as final

regulations are adopted, proposed regulations under Subpart S – Corrective Action for Solid Waste Management Units – 40 CFR 264.550, 264.551, and 264.552, Federal Register, Friday, July 27, 1990, pp. 30798-30884, shall be applicable as guidance for managing these wastes. Approval of units for managing wastes and conditions for operating the units, if approved, shall be granted through the permitting process.

#### VII.C. BIF RULE [RESERVED]

#### VII.D. AA-BB AIR REGULATIONS [RESERVED]

#### VII.E. CORRECTIVE ACTION

VII.E.1. Corrective Action for Releases – Section 3004(u) of RCRA, as amended by HSWA, and 40 CFR 264.101, requires that permits issued after November 8, 1984, address corrective action for releases of hazardous constituents from any SWMU at the facility, regardless of when the waste was placed in the unit.

##### VII.E.2. Action Levels

VII.E.2.a. Applicability – The concept of action levels shall be used by the Permittee to determine the need for further corrective actions under this permit. The Permittee shall conduct a CMS whenever concentrations of hazardous constituents in ground water, surface water, soils, or air exceeds action levels for any environmental medium; or when the administrative authority determines that concentrations of contaminants, even if below action levels, present a threat to human health or to the environment. The concept of action levels is not the same as cleanup levels, although in some cases a final cleanup level may be set to equal the action level.

VII.E.2.b. Calculation – The Permittee shall adhere to RFI guidance in the calculation of action levels for all the environmental media. These action levels shall be updated as new toxicity data and promulgated standards (e.g., maximum contaminant levels) are derived. The most recent reference doses, reference concentrations, and cancer slope factors (e.g., data found in EPA's Integrated Risk Information System) shall be utilized in the calculation of action levels. The toxicity data available at the time that a determination for further action is made (i.e., requirement to conduct a CMS), including interim measures, shall be utilized in the calculations. If used as final cleanup levels, action levels shall be calculated using the most recent toxicity data and promulgated standards existing at the time of implementation of corrective measures.

### VII.E.3. Risk Assessment

VII.E.3.a. The Permittee shall conduct human health and ecological risk assessments as necessary for the protection of human health and the environment. These risk assessments shall be used to establish baseline risk at a site and/or to derive final or interim cleanup levels at the site. These risk assessments, if necessary, shall be performed concurrently with the corrective action activities specified in this permit, including any activities undertaken during implementation of the activities proposed in the RFI Work plan. These risk assessments may also be performed concurrently with the RFI Final Report and Summary and the CMS Phase of this permit, but only after the Permittee has determined the full vertical and horizontal extent of contamination at each respective SWMU.

VII.E.3.b. The Permittee shall utilize, but not be limited to, the following EPA documents and publications: "Compendium of ORD and OSWER Documents Relevant to RCRA Corrective Action" (EPA530-B-003, April 1992); "Ecological Assessments of Hazardous Waste Sites, A Field and Laboratory Reference Document: (EPA/600/3-89/013, March 1989); "ECO Update, Ecological Assessment of Superfund Sites: An Overview" (Publication 9345.0-051, Vol. 1, No. 2, December 1991); and "ECO Update, Developing A Work Scope for Ecological Assessments" (Publication 9345.0-051, Vol. 1, No. 4, May 1992); including any subsequent revisions.

VII.E.3.b.(1). Baseline Risk Assessments – Baseline Risk Assessments, if required, shall be used to evaluate the risks posed by contaminants at a site prior to the beginning of any corrective actions. This type of risk assessment shall be used in certain circumstances (specified in Permit Condition VII.E.3.b.(2) instead of action levels (described in Permit Condition VII.E.2) to determine the need for remedial action.

VII.E.3.b.(2). Although the action level concept shall serve as a trigger for a CMS, certain exceptions will apply, but not be limited to the following circumstances. In cases where the applicable action levels are not protective enough of sensitive environmental systems, such as wetlands, estuaries, and habitats of endangered or threatened species; the Permittee shall conduct a baseline environmental risk assessment. In cases where there are confirmed releases to ground water, surface water, air, or sediments; a baseline risk assessment shall be required to determine the need for stabilization/interim measures, especially where health advisories have been issued by

local/state governments. In addition, action levels may be inappropriate at a site where there are multiple contaminants or where leaching from contaminated soils into ground water poses greater risk than ingestion of the soils.

- VII.E.3.b.(3). If an action level has been exceeded, for any of the environmental media of concern, at any time during the corrective action activities required by this permit; the Permittee may be required to conduct a risk assessment to determine risks to human health and the environment and the necessity to perform interim measures, as specified in Permit Condition VII. Risk assessment to determine final cleanup levels, a risk assessment may also be required.

The administrative authority intends to review risk assessments as part of the CMS Phase of the cleanup goals, but only after the Permittee has determined the full vertical and horizontal extent of contamination from each SWMU or groups of SWMU's specified in this permit.

- VII.E.3.c. Risk Assessment for Deriving Cleanup Levels – Risk assessments, if required, may also be used as a starting point for cleanup goals, in addition to the final cleanup level. Risk assessments may be required as specified in Permit Condition VII.E.3.b.(2)). In addition, where cleanup levels fail to incorporate significant routes of exposure at a particular site, carcinogens or meet action levels if chosen as final cleanup levels, a risk assessment may also be required.

The administrative authority intends to review risk assessments as part of the CMS Phase of the corrective action activities specified in this permit in deriving final cleanup goals, but only after the Permittee has determined the full vertical and horizontal extent of contamination from each SWMU or groups of SWMU's specified in this permit.

- VII.E.3.d. Use of Risk Assessment in Justifying No Further Action – The Permittee may submit a risk assessment(s) justifying no further action at a SWMU (s) concurrently with submittal of the RFI Final Report and Summary, only if the Permittee has determined the full vertical and horizontal extent of contamination from each SWMU or group of SWMU's specified in this permit.

- VII.E.4. Corrective Action for Releases Beyond Facility Boundary – Section 3004(v) of RCRA as amended by HSWA, and Federal regulations promulgated as 40 CFR 264.101©, require corrective actions beyond the facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates that, despite the Permittee's best efforts, the

Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where offsite access is denied.

VII.E.5. Financial Responsibility – Assurances of financial responsibility for corrective action shall be provided as specified in the permit following major modification for remedy selection.

VII.E.6. Dispute Resolution

VII.E.6.a. The parties shall use their best efforts to informally and in good faith resolve all disputes or differences of opinion. If, however, disputes arise concerning the corrective action which the parties are unable to resolve informally, the following procedures shall apply. If Permittee's dispute concerns its inability to meet a specified deadline, then Permittee is obligated to advise the administrative authority of the issue at least thirty (30) days in advance of the deadline.

VII.E.6.b. The administrative authority shall provide Permittee written notice of its disapproval or modification of any interim submission under HSWA, including, but not limited to, implementation of work plans, approval of documents, scheduling of any work, or selection, performance, or completion of any correction of any corrective action. The written notice of disapproval or modification shall set forth the reasons for the disapproval or modification. If the Permittee disagrees, in whole or in part, with any such written notice, the Permittee shall notify the RCRA permits staff manager (i.e., RCRA Permits Associate Director when EPA is the administrative authority), in writing, within 10 days of receipt of the written notice. The Permittee and the RCRA permits staff shall use their best efforts to informally and in good faith resolve the dispute.

The Permittee is entitled to meet with RCRA permits staff in person at the administrative authority's office or by teleconference, if it so desires, in order to resolve the dispute.

VII.E.6.c. If Permittee and the RCRA permits staff are unable to resolve the dispute, the Permittee may request a final decision by the administrative authority's official having been delegated final permit approval authority (i.e., the EPA Division Director who signs the permit when EPA is the administrative authority.) Within 30 days of receipt of the administrative authority's written notice, the Permittee shall submit to the permit approval authority, a written statement of its arguments and explanations

of its position. The written statement should include, at minimum, the specific points of dispute, the position the Permittee maintains should be adopted as consistent with the permit requirements and the basis, therefore, any matters which it considers necessary for proper determination of the dispute, and whether the Permittee requests an informal determination of the dispute, and whether the Permittee requests an informal conference in front of the permit approval authority. The Permittee's failure to follow the procedures set forth in this paragraph will constitute a waiver of its right to further consideration of the dispute.

- VII.E.6.d. The administrative authority's duly appointed official having final permit approval authority, at his/her discretion, will determine whether an informal conference, if requested by the Permittee, will not be held.
- VII.E.6.e. The administrative authority shall consider the written position of the Permittee and the oral arguments, if an informal conference is convened, and shall provide a written statement of its decision based on the record. This statement shall be considered to be incorporated as an enforceable part of the permit. The written statement shall respond to the Permittee's arguments and shall set forth the reasons for the administrative authority's final decision. Such decision shall be the final resolution of the dispute and shall be implemented immediately by the Permittee according to the schedule contained therein.
- VII.E.6.f. Notwithstanding the invocation of this dispute resolution procedure, the Permittee shall proceed to take any action required by those portions of the submission and of the permit the administrative authority determines are not substantially affected by the dispute.
- VII.E.6.g. The Permittee shall invoke the Dispute Resolution provisions of this permit in good faith and not for purposes of delay.

## VII.F. REPORTING REQUIREMENTS

- VII.F.1. The Permittee shall submit, in accordance with Permit Condition VII.B.7., signed quarterly progress reports of all activities (i.e., RFI, CMS) conducted pursuant to the provisions of this permit beginning no later than ninety (90) calendar days from the effective date of this permit. These reports shall contain:
  - VII.F.1.a. A description of the work completed and an estimate of the percentage of work completed;

- VII.F.1.b. Summaries of all findings, including summaries of laboratory data;
- VII.F.1.c. Summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems;
- VII.F.1.d. Projected work for the next reporting period;
- VII.F.1.e. Summaries of contracts pertaining to corrective action or environmental matters with representatives of the local community, public interest groups, or State government during the reporting period;
- VII.F.1.f. Changes in key project personnel during the reporting period; and
- VII.F.1.g. Summaries of all changes made in implementation during the reporting period.

VII.F.2. Copies of other reports relating to or having bearing upon the corrective action work, (e.g., inspection reports, drilling logs, and laboratory data) shall be made available to the administrative authority upon request.

VII.F.3. In addition to the written reports as required in permit Condition VII.F.1 and VII.F.2, above, at the request of the administrative authority; the Permittee shall provide status review through semi-annual briefings with the administrative authority.

#### VII.G. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY-IDENTIFIED SWMU's AND POTENTIAL AOC's

VII.G.1. The Permittee shall notify the administrative authority, in writing, of any newly-identified SWMU(s) and potential AOC's (i.e., a unit of area not specifically identified during the RFA,) discovered in the course of ground water monitoring, field investigations, environmental audits, or other means, no later than thirty (30) calendar days after discovery. The Permittee shall also notify the administrative authority of any newly-constructed land-based SWMU's (including but not limited to, surface impoundments, waste piles, landfills, land treatment units) and newly-constructed SWMU's where any release of hazardous constituents may be difficult to identify (e.g., underground storage tanks) no later than thirty (30) days after construction. The notification shall include the following items, to the extent available.

VII.G.1.a. The location of the newly-identified SWMU or potential AOC on the topographical map required under 40 CFR Section



270.14.(b).(19); indicating all existing units (in relation to other SWMU's);

- VII.G.1.b. The type and function of the unit;
- VII.G.1.c. The general dimensions, capacities, and structural description of the unit (supply any available drawings);
- VII.G.1.d. The period during which the unit was operated;
- VII.G.1.e. The specifics, to the extent available, on all wastes that have been or are being managed at the SWMU or potential AOC; and
- VII.G.1.f. Results of any sampling and analysis required for the purpose of determining whether releases of hazardous waste including hazardous constituents have occurred, are occurring, or are likely to occur from the SWMU or whether the AOC should be considered a SWMU.

#### VII.H. NOTIFICATION REQUIREMENTS FOR NEWLY-DISCOVERED RELEASES AT SWMU(s) AND AOC(s)

The Permittee shall notify the administrative authority in writing, no later than fifteen (15) calendar days after discovery, of any release(s) from a SWMU or AOC of hazardous waste or hazardous constituents discovered during the course of ground water monitoring, field investigation, environmental auditing, or other means. Such newly-discovered releases may be from newly-identified SWMU's or AOC's, newly-constructed SWMU's, or from SWMU's or AOC's for which, based on the findings of the RFA, completed RFI, or investigation of an AOC(s), the administrative authority had previously determined no further investigation was necessary. The notification shall include information concerning actual and/or potential impacts beyond the facility boundary and on human health and the environment if available at the time of the notification. The administrative authority may require further investigation and/or interim measures for the newly-identified release(s), and may require the Permittee to prepare a plan for the investigation and/or interim measure. The plan will be reviewed for approval as part of the RFI Work plan or a new RFI Work plan. The permit will be modified according to Permit Condition VII.B.3. to incorporate the investigation, if required.

#### VII.I. INTERIM MEASURES

- VII.I.1. If during the course of any activity initiated under this permit, the administrative authority determines that a release or potential release of hazardous constituents from a SWMU poses a threat to human health and the environment; the administrative authority may require interim measures. The administrative authority shall determine the specific measure(s) or require the Permittee to propose a measure(s). The interim measure(s) may include a permit modification, a schedule for implementation, and a written plan. The

administrative authority shall notify the Permittee in writing of the requirement to perform interim measures. The administrative authority may modify this permit according to Permit Condition VII.B.3 to incorporate interim measures into the permit.

VII.I.2. The Permittee may propose interim measures at any time. The proposal shall include a written plan and a schedule for implementation. Depending upon the nature of the interim measure, a permit modification may not be required.

VII.I.3 The following factors will be considered by administrative authority in determining the need for interim measures and the need for permit modification:

VII.I.3.a. Time required to develop and implement a final remedy;

VII.I.3.b. Actual and potential exposure to human and environmental receptors;

VII.I.3.c. Actual and potential contamination of drinking water supplies and sensitive ecosystems;

VII.I.3.d. The potential for further degradation of the medium in the absence of interim measures.

VII.I.3.e. Presence of hazardous wastes in containers that may pose a threat of release;

VII.I.3.f. Presence and concentration of hazardous waste including hazardous constituents in soil that have the potential to migrate to ground water or surface water;

VII.I.3.g. Weather conditions that may affect the current levels of contamination;

VII.I.3.h. Risks of fire, explosion, or accident; and

VII.I.3.i. Other situations that may pose threats to human health and the environment.

VII.J. RFI WORKPLAN [Reserved]

# **ATTACHMENT 1**

**ATTACHMENT 1**  
**LIST OF FACILITY DOCUMENTS INCORPORATED**  
**IN THE PERMIT BY REFERENCE**

**LAR000003483**

**AI#25738**

DOCUMENT TYPE	APPLICATION /DOCUMENT DATE	ELECTRONIC DATABASE MANAGEMENT SYSTEM (EDMS) DOCUMENT ID	COMMENTS
Closure Certification Report EDC Basin and Associated Ditches Volumes 1 & 2	2/2/2000	7411737 (Volume 1) 7412417 (Volume 2)	
Groundwater Sampling and Analysis Plan	9/16/2004 11/7/2007	32407315 36398160	